

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIGI PORTAL LLC,

Plaintiff,

v.

BOOKING HOLDINGS INC.,

Defendant.

C.A. NO. _____

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Digi Portal LLC files this Original Complaint for Patent Infringement against Booking Holdings Inc., and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Digi Portal LLC (“Digi Portal” or “Plaintiff”) is a Texas limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, Texas 75074.

2. On information and belief, Defendant Booking Holdings Inc. (“Defendant”) is a corporation organized and existing under the laws of Delaware, with a place of business at 800 Connecticut Avenue, Norwalk, CT 06854. Defendant has a registered agent at Corporation Service Company, 251 Little Falls Dr., Wilmington, DE 19808.

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the Delaware Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged

herein. Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Delaware corporation.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Delaware. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Delaware. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Delaware. Defendant has committed such purposeful acts and/or transactions in Delaware such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant is incorporated in Delaware. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 8,352,854)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On January 8, 2013, United States Patent No. 8,352,854 ("the '854 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '854 Patent is titled "Dynamic Page Generator." The '854 patent is not subject to a terminal disclaimer and its

term is extended under 35 U.S.C. 154(b) by 1270 days. (Ex. A). A true and correct copy of the ‘854 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. Digi Portal is the assignee of all right, title and interest in the ‘854 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘854 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘854 Patent by Defendant.

11. The application leading to the ‘854 patent is a continuation of U.S. application Ser. No. 11/656,636, filed Jan. 22, 2007, which is a continuation of U.S. application Ser. No. 09/393,718, filed Sep. 10, 1999, which is a continuation of U.S. application Ser. No. 08/873,975, filed Jun. 12, 1997. (Ex. A at cover). The ‘854 patent was first assigned to Yahoo! Inc. (*Id.*).

12. The invention in the ‘854 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:26-30).

13. Web servers for serving static web pages were well known in the global Internet. (*Id.* at col. 1:31-32). Such static web pages are useful in many applications whether the information presented to each requesting user is the same. (*Id.* at col. 1:32-34). However, some applications require customization to appeal to users. (*Id.* at col. 1:34-35). One example is presenting news to users. (*Id.* at col. 1:35-37). When static pages are used, a user will often have to scroll through many topics not of interest to that user to get to the information of interest. (*Id.* at col. 1:37-40). However, when presenting news to users, customized web pages present news that is more relevant to the requesting user than static pages because the information is filtered according to each user’s interest. (*Id.* at col. 1:35-37, 40-41).

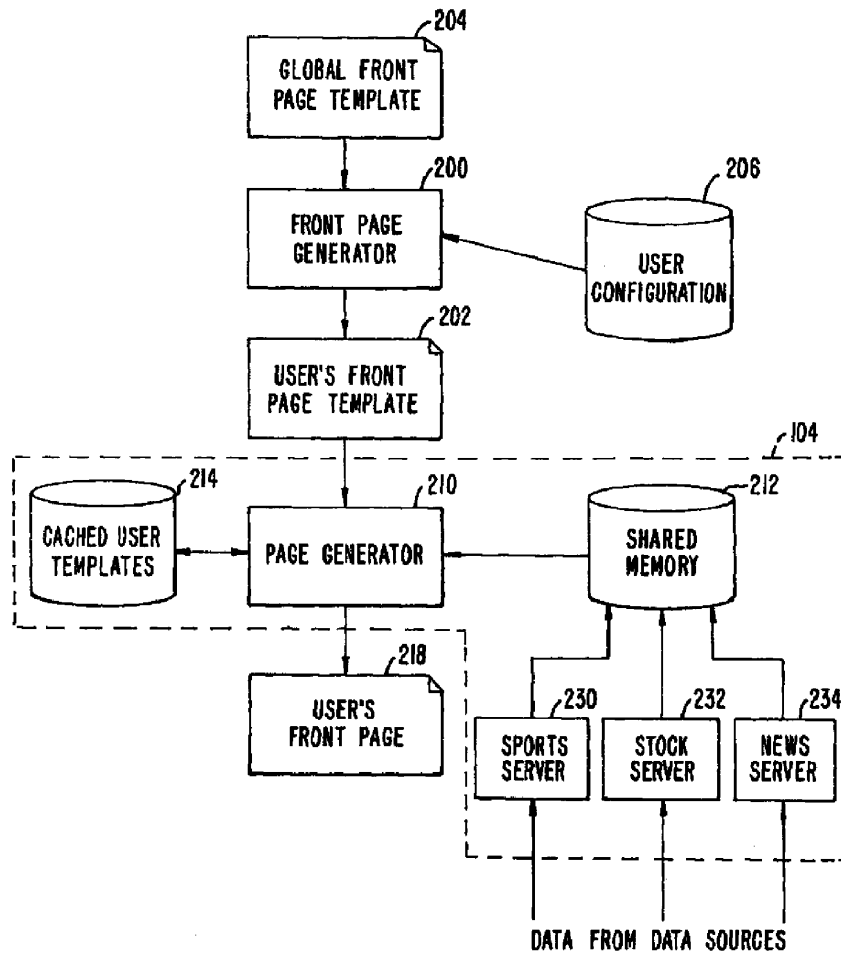
14. Customizing a server response based on the requester is known; however, known systems do not scale well. (*Id.* at col. 1:42-43). One method of serving custom pages is to execute a script, such as a Common Gateway Interface (CGI) script or other program to collect the information necessary to generate the custom page. (*Id.* at col. 1:43-47). For example, if the custom page is a news page containing stock quotes, sports scores and weather, the script might poll a quote server to obtain the quotes of interest, poll a sports score server to obtain the scores of interest and poll a weather server to obtain the weather. (*Id.* at col. 1:47-51). With this information, the server generates the custom page and returns it to the user. (*Id.* at col. 1:51-52). This approach is only useful where there are not many requesters and where the attendant delay associated with polling various servers to obtain the requested information is acceptable to users. (*Id.* at col. 1:53-54). Growing impatience with waiting will turn users away from such servers, especially as use increases. (*Id.* at col. 1:54-58).

15. One approach that was used in the prior art to avoid long waits is to transfer the custom information in non-real-time, so that the information is stored local to the user as it arrives and is presented to the user on request. (*Id.* at col. 1:59-62). A disadvantage of such a system is that the networks used by the user become clogged with data continually streaming to the user and require large amounts of local storage. (*Id.* at col. 1:62-65). Another disadvantage is that the locally stored information will become out of date as the server receives new data. (*Id.* at col. 1:65-67).

16. The inventors therefore recognized that there was a need to dynamically generate customized pages in an unconventional manner that solved the technical problems in the prior art of long transfer times to obtain the requested information or having to rely on continually

transferring custom information in non-real time which can clog the data network in addition to providing outdated information. (*Id.* at col. 1:42 to col. 2:2).

17. The following is a discussion of non-limiting examples of the claimed invention discussed in the specification of the '854 patent. The '854 patent provides a non-limiting exemplary diagram of the generation of a custom page for a user, using a front-page generator (200) and page server (104) (*Id.* at col. 3:58-60):



(Ex. A at Fig. 2). Front page generator (200) generates a user template (202) from a global front page template (204) and a user configuration record (206). (*Id.* at col. 3:58-62). A non-limiting example of a global front page template is provided in the '854 patent:

```

<html>
<head>
<title>My Yahoo! news summary for <!-- login --></title>
</head>
<body>

<center>
<!-- banner:sum -->

<!-- ad -->
<!-- nav bar --> ~ 302
</center>

<table border=1 cellpadding=4 cellspacing=0 width=100%>
<tr><td align=center valign=top width="1%">
<!-- leftside:nsum --> ~ 302
<p></td>
<td align=center valign=top width="100%">
<!-- mode bar:"FRONT PAGE" -->
<!-- channel:nsum --> ~ 302

</td></tr>
</table>

<center>
<table border=1 cellpadding=2 cellspacing=0 width=100%>
<!-- motd:motn.html -->
</table>
</center>
<!-- search -->

<!-- copyright:sum -->

</body>
</html>

```

204

(Ex. A at Fig. 3). The global user template (204) is an HTML (HyperText Markup Language) document with additional tags as placeholders for live data. (*Id.* at col. 5:16-19). Several placeholders (302) are shown in the code. (*Id.* at col. 5:19).

18. A user configuration record (206) is a record selected from user configuration database (116). (*Id.* at col. 3:63-64). User configuration information includes user demographic information, such as sex, age, location, stock quotes, favorite sports teams, news topics, etc. (*Id.* at col. 2:13-14, col. 5:45-50, col. 6:37-39, 46-48, 52-56). The user configuration information in the example may not change until the user changes his or her preferences. (*Id.* at col. 5:33-35).

19. The '854 patent provides an illustration of a user template (202) as might be generated from global user template (204) and a user configuration record (206):

202

```

    <!-- timezone:-8,PT 0 -->
    <!-- ad:M,85,95035,T,* 792 -->
    <!-- portfolio:Quotes,pf_1,1,^DJI,^NYA,^IXIC,^SPX,^XAX,YHOO,NSCP,IOM,NSCP,YHOO
404 { 2836 -->
    <!--
scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NFLSFO
,NLSFO 3803 -->
    <!-- weather:f,30901,uk_londo,94601,95101 4368 -->
    <!--
mode_bar:"FRONT_PAGE",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/news
/summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
    <!-- motd:us_motn.html 4696 -->
    <html>
    <head>
    <title>My Yahoo! news summary for ash802</title>
    </head>
    <body>

    ...

    </body>
    </html>

```

(Ex. A at Fig. 4). The user template is unique because it is built based on user demographic information provided by the user, as opposed to generically chosen dynamic information or based on information provided by the server. Exemplary demographic information is shown in line 2 of Fig. 4 (“:M,85,95035,T,*”) indicating that the user is a male, age 85, located in zip code 95035, etc. (*Id.* at col. 5:42-45). The ‘854 patent includes a full listing of the non-limiting exemplary user template of Fig. 4 in Appendix A. (Ex. A at col. 2:57-58; col. 5:22-23).

Listing of a User Template

```
<!-- timezone: -8,Pt 0 -->  
<!-- ad:M,85,95035,T,* 792 -->  
<!--  
portfolio:Quotes,pf_1,1,'DJL','NYA','IXIC','SPX','XAX,YHOO,NSCP,IOM,NSCP,YHOO  
2836 -->  
<!--  
scoreboard:NCAAFSSC,NILSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCDD,NFL  
LSFO,NLSFO 3803 -->  
<!-- weather:f,30901,uk londo,94601,95101 4368 - - >  
<!--  
mode_bar:"FRONT_PAGE1","hier=News+Summary%3aEdit&.done=http://my.yahoo.com/  
news/summary.html?v 4538 -->  
<!-- summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->  
<!-- motd:us__motn.html 4696 -->  
  
<html>  
<head>  
<title>My Yahoo! news summary for ash802</title>  
</head>  
<body>  
  
<center>  
<map name="top"><area shape=rect coords="0,0,45,66"  
href="/news/summary.html?v"><area shape=rect coords="45,0,90,66"  
href="/internet/directory.html?v"><area shape=rect coords="90,0,135,66"  
href="/contacts/white_pages.html?v"><area shape=rect coords="135,0,346,66"  
href="/myHome"><area shape=rect coords="346,0,389,66"  
href="/help/news/summary.html"><area shape=rect coords="389,0,431,66"  
href="http://edit.my.yahoo.com/config/eval_profile"><area shape=rect  
coords="431,0,477,66" href="http://edit.my.yahoo.com/config/tofly">  
</map>  
<center><a href="/bin/top_menu"></a></center>  
  
<p>  
<center><form action="http://search.my.yahoo.com/search/my"> <font  
size="-2">[ <a  
href="http://edit.my.yahoo.com/config/set_attr?attr=sloc&value=b&.done=htt  
p://my.yahoo.com/news/summary.html?v">move to bottom</a> ] </font><input  
size=25 name=p> <font size="-1">&nbsp;   <input type=submilt  
value=Search><input type=hidden name=n value="25"> &nbsp;   <a  
href="http://search.my.yahoo.com/search/my/options">Options</a></fo  
rm></center><p>  
<center>  
<table border=0 cellspacing=0 cellpadding=2>  
<tr>  
<td align=center><font  
color="#000000"><b>Sections:</b>&nbsp;   &nbsp;  </font></td>  
<td align=center bgcolor="#dcdcdc"><font  
color="#000000"><b>Front.&nbsp;   Page</b></font></td>  
<td>&nbsp;   &nbsp;  &nbsp;  </td>  
<td align=center><a href="/news/business/summary.html?v">Business</a></td>  
<td>&nbsp;   &nbsp;  &nbsp;  </td>  
<td align=center><a  
href="/news/portfolio_summary.html?v">Portfolios</a></td>  
<td>&nbsp;   &nbsp;  &nbsp;  </td>  
<td align=center><a  
href="/news/entertainment/summary.html?v">Entertainment</a></td>  
<td>&nbsp;   &nbsp;  &nbsp;  </td>  
<td align=center><a href="/news/sports/summary.html?v">Sports</a></td>  
<td>&nbsp;   &nbsp;  &nbsp;  </td>  
<td align=center><a  
href="/news/technology/summary.html?v">Technology</a></td>  
</tr>  
</center>  
</center>  
<table border=1 cellpadding=4 cellspacing=0 width="100%">  
<tr><td align=center valign=top width="1%">  
<a  
href="http://edit.my.yahoo.com/config/eval_left?mode=left_nsum&.done=http%  
3a%2f%2fmny%2eyahoo%2ecom%2fnews%2fsummary%2html%3fv"></a>  
<table border=0 cellpadding=1 cellspacing=0 width="100%">  
<tr bgcolor="#dcdcdc"><td colspan=4 width="100%"><table border=0  
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><b><font  
size="+1">P</font size="+0">ORTIFOLIOS</font></b></td></tr>
```


[illegible]

```

src="http://www.yahoo.com/images/my/logout.gif" alt="Change
User"></a></td>
</tr>
</table>
</center>
<map name=logout>
<area coords="0,0,50,68" href="/my/?http://www.yahoo.com/">
<area coords="51,0,100,68"
href="http://edit.my.yahoo.com/config/login?logout=1">
</map>

</body>
</html>

```

(Ex. B at Col. 7-11).

20. As shown in Fig. 2 of the '854 patent, the user template does not need to be generated each time and instead can be generated and stored. (Ex. A at col. 4:49-51, col. 5:23-32). One benefit of the claimed invention that speeds up the operation of the dynamic page generation is that the page can be stored in multiple locations that are based on the frequency by which the user requests the customized page based on the user template. (*Id.* at col. 5:37-38, col. 6:49-59). Some users might choose to access their user page infrequently, while others might choose to access their front page hourly. (*Id.* at col. 6: 52-54). For infrequent users, the user template is stored in a user configuration database, whereas for frequent users the user template may also be stored in cache. (*Id.* at col. 5:37-38, col. 6:51-59). Caching reduces the time to respond to a request for a page and is more effective where the typical user makes several requests in a short time span and then doesn't make any requests for a long period of time. (*Id.* at col. 5:29-32).

21. When the user template stored in cache, it may be stored long enough to be reused and may also be flushed from cache if the user page has been inactive for several days. (*Id.* at col. 6:49-52, 59-60). Even if it is flushed from cache, the user template can be maintained in the user configuration database, which can then be quickly accessed and stored in cache in the event a user may start to access the user page quickly. (*Id.*).

22. The custom user page can also include an advertisement that is selected based on the user demographic information. (*Id.* at col. 5:39-42). For example, using the demographic information “:M,85,95035,T,*”, an advertisement can be selected that is targeted for a male user, age 85, located in zip code 95035, etc. (*Id.* at col. 5:39-45).

23. Appendix B of the ‘854 patent is an HTML source code listing of an HTML page created from an executed user template that is used to generate a user customized browser web page. (Ex. B at col. 11 – col. 19).

24. As explained the ‘854 patent and prosecution history, there are unconventional and non-generic features of the claimed invention which are technical improvements that make the generation of dynamic web pages quicker, more efficient, and use less resources. By storing the user customized template program in two locations in which the location is determined by frequency, the system is more efficient and allows for a quicker response than the prior art. For example, by storing the user customized template in user configuration database and in cache, the dynamic generation of a user customized web page is more efficient and uses less resources of the server, database, and network, and allows for a quicker generation of the dynamic web page thereby allowing the server to scale in order to handle substantially more requests for user customized dynamic web pages. (*See* Ex. A at col. 1:42-67, col. 4:49-col. 5:15, col. 5:23-32). Furthermore, by caching the user template, the page can be generated entirely within a page server, thus conserving network and database resources. (*See id.* at col. 4:10-11, col. 5:23-32). By also storing the user customized template in a user configuration database, even if the cache is cleared, the template already exists in the database which then prevents having to regenerate a new user customized page from a global page template using a user configuration record thus saving database and server resources and more quickly generating the requested web page from

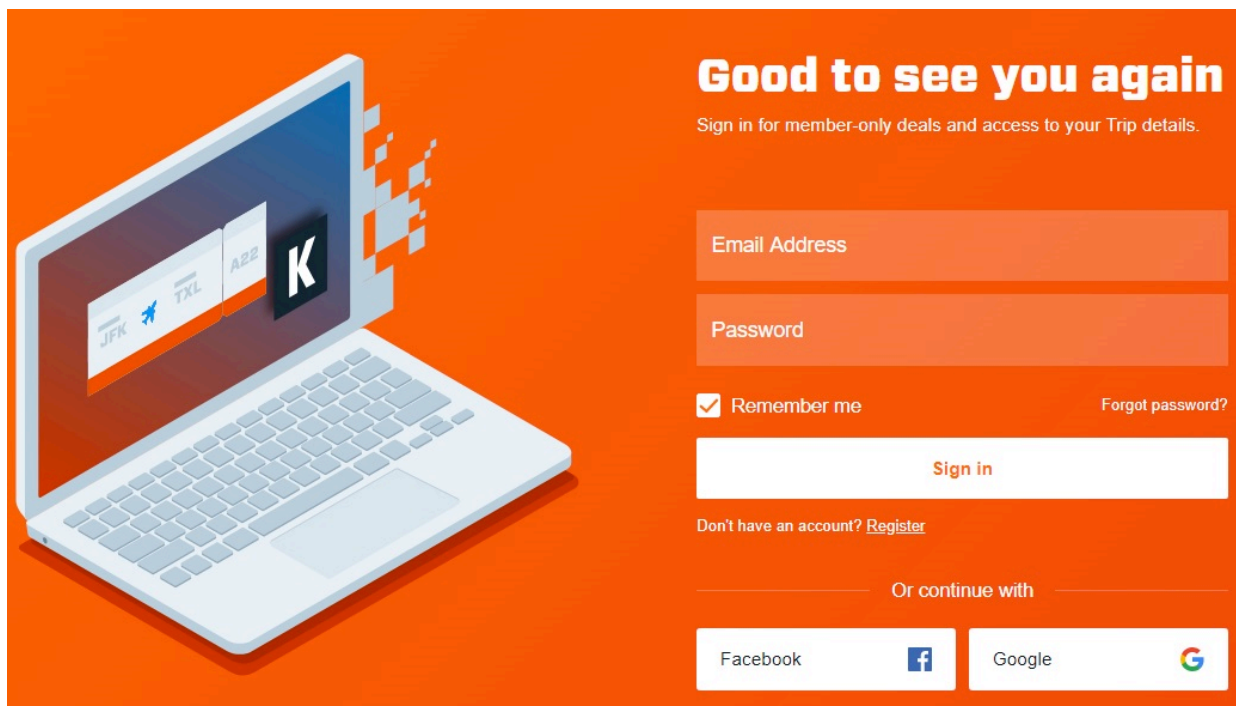
the user customized template. (*E.g.*, *id.* at col. 3:37-39, col. 4:1-11, 49-62). The storage of a user customized template program in at least two locations and the location determined from the frequency of the user request for the customized page was an unconventional and non-generic method for storing such templates and was not disclosed in the prior art. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9).

25. Furthermore, the invention provides for more personalized web pages because the user provides user configuration information on which the user customized template is generated. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9; Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6). This was an unconventional way for generating a user customized template unique to the user that was not found in the prior art. (Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6).

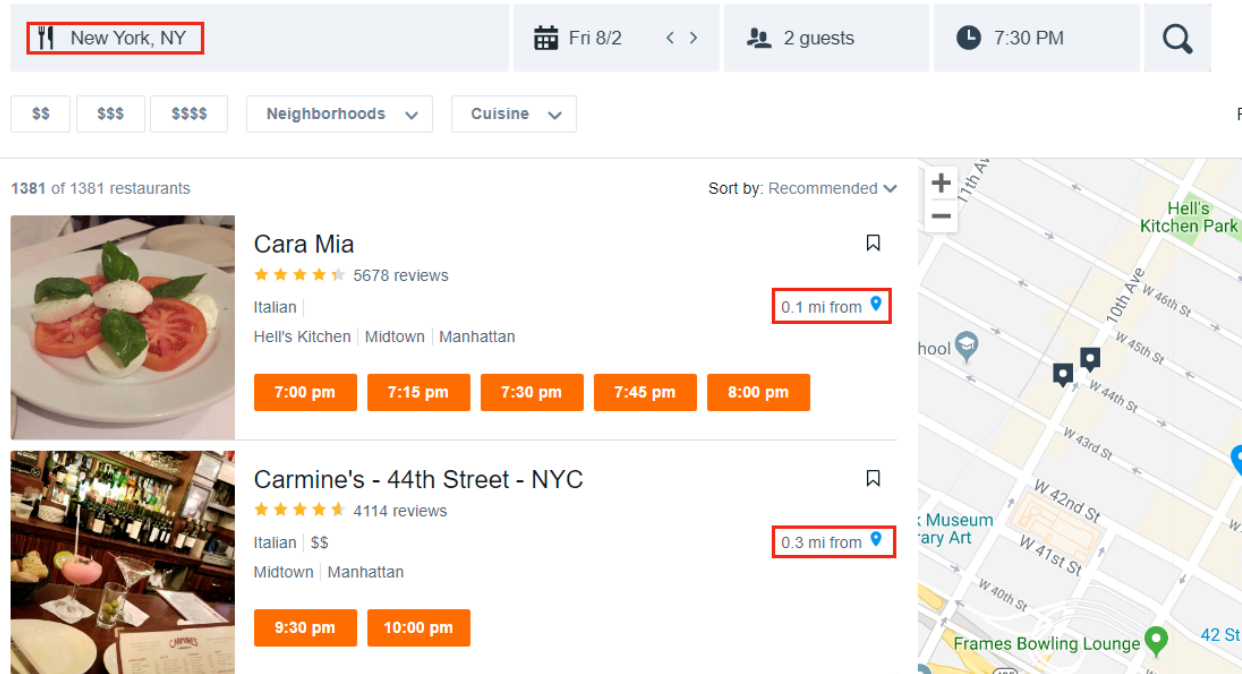
26. The patents related to the ‘854 patent and sharing the same specification were cited during the prosecution history of over 700 patents, including patents and applications owned by companies including Google, Inc., Microsoft Corporation, Amazon Technologies, Inc., Facebook, Inc., Ebay, Inc., Salesforce.com, Inc., IBM Corporation, Oracle International Corporation, Comcast Cable Communications, LLC, SAP AG, Citrix Systems, Inc., BEA Systems, Inc., Sprint Communications Company L.P., Siemens AG, AT&T Intellectual Property I, L.P., Hewlett-Packard Development Company, L.P., Fujitsu Limited, AOL LLC, General Electric Company, Accenture LLP, Adobe Systems Inc., Sony Computer Entertainment Inc., and Akamai Technologies, Inc. (See <http://patft.uspto.gov/netacgi/nph-Parser?Sect1=PTO2&Sect2=HITOFF&p=1&u=%2Fnethtml%2FPTO%2Fsearchbool.html&r=0&f=S&l=50&TERM1=5983227&FIELD1=UREF&co1=AND&TERM2=&FIELD2=&d=PTXT>).

27. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1-3, 8-10, and 15 of the '854 patent in Delaware, and elsewhere in the United States, by performing the claimed method, using the claimed computer-readable non-transitory medium storing computer instructions, and/or making and/or using the claimed system at Kayak.com (“Accused Instrumentality”).

28. The Accused Instrumentality performs the step of receiving a user request for a customized page. For example, Kayak.com receives a user request for a user customized page:



(E.g., <https://www.Kayak.com/profile/secure/login/?continue=%2F>).



(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

29. The Accused Instrumentality performs the step of receiving a template program (e.g., software instructions and data used for rendering a particular user's Kayak.com page such as a JavaScript page) that is unique to the user and based on user configuration information (e.g., JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user). The user configuration information is supplied by the user (e.g., a user defines the information the user's template will display by inputting information such as the user's location; a user can customize the content of their templates and what will be rendered and displayed using the templates by entering information such as the user's location) and used to build the template program that is unique to the user (e.g., user profile and user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page). The following screenshots demonstrate the result of the Accused Instrumentality satisfying these limitations:

The screenshot displays a hotel search interface. At the top, the search criteria are "Citizenm New York Bowery - New York, NY" (highlighted with a red box), "Fri 8/2", and "Sat 8/3". The results show 716 of 1995 hotels and homes, sorted by Recommended. On the left, filters include Stars (0+ to 5), Review score (0+ to 9+), Price (\$49 to \$1095), and Freebies (Free breakfast, Free parking, Free Internet, Free cancellation). The main listing for Citizenm New York Bowery shows a 9.2 rating (Excellent), 2,598 reviews, and a location of Lower Manhattan (highlighted with a red box). The price is \$199 on Expedia, with a "View Deal" button. Below this, a section titled "Open to alternatives? We recommend these nearby hotels:" features a listing for W New York - Downtown with an 8.5 rating (Great), 1,270 reviews, and a location of Financial District (highlighted with a red box). The price is \$199 on Priceline, with a "View Deal" button.

(E.g., https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

30. For example, each user's respective pages demonstrates that the template program is varied so that each user can receive appropriately customized pages (e.g., the code for each respective page is updated/adapted to pull from different resources so that the appropriate information/data can be referenced/displayed for each user). The screenshots below show two different templates belonging to two respective users based on user configuration information with the user configuration information (including user demographic information) being supplied by the user that is used to build the template program that is unique to the user:

First User

Fri 8/2
 < >
 Sat 8/3
 < >

Go to map

716 of 1995 hotels and homes

Sorted by Recommended

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

\$49 \$1095

Nightly base price

Freebies

☐ Free breakfast 267
☐ Free parking 93
☐ Free Internet 648
☐ Free cancellation 27

Citizenm New York Bowery

★★★★

9.2 Excellent 2,598 reviews

Location Lower Manhattan

Hotels.com \$199 citizenM \$199 TripAdvisor \$199 8 more sites

YOUR FIRST CHOICE.

"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

\$199

Expedia

Deal includes Free WiFi

View Deal

Open to alternatives? We recommend these nearby hotels:

W New York - Downtown

★★★★

8.5 Great 1,270 reviews

Location Financial District

Expedia \$199 Booking.c... \$199 AMOMA.c... \$177 9 more sites

\$199

Priceline

View Deal

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User

Chicago, IL

Sat 8/3 > < Sun 8/4 < >

281 of 749 hotels and homes Sorted by Recommended

Go to map

Stars

Review score

Price

Palmer House a Hilton Hotel

Save 19%

8.4 Great 10,125 reviews

Location Downtown Chicago

\$443 \$359 Expedia View Deal

Chicago Marriott O'Hare

BEST BUSINESS HOTEL

\$169 Priceline

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

31. As another example, a user can customize their Kayak.com page by selecting their saved airlines/hotels/restaurants or setting price alerts, so that selected airlines/hotels/restaurants and price alerts can be displayed. Below are screenshots pertaining to the selection process.

Your brands

Airlines

Add airlines you prefer or would like to avoid

Preferred

ame

Avoid

Search airlines

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred


Search hotel chains


(<https://www.kayak.com/profile/preferences> (for a particular user)).

Airlines

Add airlines you prefer or would like to avoid

Preferred

 American Airlines X


 British Airways X

Avoid

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

 Park Hyatt X

(<https://www.kayak.com/profile/preferences> (for a particular user)). Shown below are screenshots of webpages customized according to the selected airlines/hotels/restaurants and price alerts of two respective users.

First User

Airlines

Add airlines you prefer or would like to avoid

Preferred

American Airlines



British Airways



Search airlines

Avoid

Search airlines

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

Park Hyatt



Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

Create a Price Alert

**The Roxy Hotel Tribeca**

8/2 - 8/3

New York, NY

2 guests, 1 room

[Delete](#)**\$209**[View](#)Alerts **ON**[View in New York Trip](#)**The Marilton Hotel**

8/2 - 8/3

New York, NY

2 guests, 1 room

[Delete](#)**\$235**[View](#)Alerts **ON**[View in New York Trip](#)

(<https://www.kayak.com/profile/notifications> (for a particular user)).


Second User


Your brands

Airlines

Add airlines you prefer or would like to avoid

Preferred

 Air France X


 Empire Airlines X

Avoid

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

 JW Marriott X


Suggested Hotel Chains





Aloft +

Cambria Suites +

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

 [Create a Price Alert](#)

	Cambria Hotel Chicago Mag Mile 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$349	View
	Alerts ON	View in Chicago Trip		
	Aloft Chicago Downtown River North 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$259	View
	Alerts ON	View in Chicago Trip		

20

(<https://www.kayak.com/profile/notifications> (for a particular user)). On information and belief, “preferred airlines/hotels/restaurants” data is stored locally in cookies. The JavaScript file, which has a utility function, is retrieved from the CDN and handles storing and retrieval of the saved airlines/hotels/restaurants, and user data stored and retrieved from local storage or cookie locations.

32. The user configuration information supplied by the user to build the template program includes user demographic information (*e.g.*, a user’s profile information and/or configuration information such as the user’s name, address, postal code and other information). (*E.g.*, <https://www.kayak.com/privacy#collectinfo>; <https://www.kayak.com/privacy#trackingtools>).

33. The template program is received from one of at least two locations (*e.g.*, the data and templates comprising a user’s page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized Kayak.com page (*e.g.*, based on the frequency at which a user logs in or accesses their Kayak.com page, the data comprising the users page may be stored at a main server). On information and belief, template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in local storage on the user’s computer. On information and belief, running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available restaurants and other site logic-based conditions. On information and belief, the user information is stored in multiple locations, which

can include, (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

```
a.removeEventListener("load",R),r.ready()}"complete"===d.readyState||"loading"!==d.readyState&&!d.documentElement.doScroll?a.setTimeout(r.ready):(d.addEventListener("DOMContentLoaded",R),a.addEventListener("load",R));var S=function(a,b,c,d,e,f,g){var h=0,i=a.length,j=null==c;if("object"===r.type(c)){e=!0;for(h in c)S(a,b,h,c[h],!0,f,g)}else if(void 0!==(e=!0,r.isFunction(d))||g=!0,j&&(g?(b.call(a,d),b=null):(j=b,b=function(a,b,c){return j.call(r(a),c)})),b)for(;h<i;h++)b(a[h],c,g?d:d.call(a[h],h,b(a[h],c)));return e?a:j}b.call(a):i?b(a[0],c):f,T=function(a){return 1===a.nodeType||9===a.nodeType||11===a.nodeType};function U(){this.expando=r.expando+U.uid++}U.uid=1,U.prototype={cache:function(a){var b=a[this.expando];return b||(b={},T(a)&&(a.nodeType?a[this.expando]=b:Object.defineProperty(a,this.expando,{value:b,configurable:!0}))),b},set:function(a,b,c){var d,e=this.cache(a);if("string"===typeof b)e[r.camelCase(b)]=c;else for(d in b)e[r.camelCase(d)]=b[d];return e},get:function(a,b){return void 0===b?this.cache(a):a[this.expando]&&a[this.expando][r.camelCase(b)],access:function(a,b,c){return void 0===b||b&&"string"===typeof b&&void 0===c?this.get(a,b):(this.set(a,b,c),void 0!==(c=b)),remove:function(a,b){var c,d=a[this.expando];if(void 0!==(d){if(void 0!==(b){r.isArray(b)?b=b.map(r.camelCase):(b=r.camelCase(b),b=b in d?[b]:b.match(K)||[]),c=b.length;while(c--){delete d[b[c]]}(void 0===b||r.isEmptyObject(d))&&(a.nodeType?a[this.expando]=void 0:delete a[this.expando])}},hasData:function(a){var b=a[this.expando];return void 0!==(b&&!r.isEmptyObject(b))};var V=new U,W=new U,X=/^(?![\wW]*\|)[\wW]*$/Y=/[A-Z]/g;function Z(a){return"true"===a||"false"!==a&&("null"===a?null:a===+a?"":a:X.test(a)?JSON.parse(a):a)}function $(a,b,c){var d;if(void 0===c&&1===a.nodeType)if(d="data-
```

(<https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-kayakrairainbow&cluster=5> (for a particular user)).

```
a)?n:1.noop},setDebugMatch:function(a){null!=a&&"!a?(this.setDebug(!0),e=a):(this.setDebug(!1),e=null)},ready:function(a,c){R9.events._globals[a]=c;R9.events.publish(a,c),unready:function(a){delete R9.events._globals[a]},_pub:function(a,c){(R9.events._queue[a]||[]).forEach(function(b){b(a,c)}),_sub:function(a,c){R9.events._queue.hasOwnProperty(a)||R9.events._queue[a]=[];if("number"===typeof c.priority&&-1<c.priority){for(var b=0;b<R9.events._queue[a].length;b++){var d=R9.events._queue[a].priority;if(void 0===d||-1===d){d>priority?break}R9.events._queue[a].splice(b,0,c)}else R9.events._queue[a].push(c)},_unsub:function(a,c){var b=R9.events._queue[a];b&&(R9.events._queue[a]=b.filter(function(a){return a!==c})),_queue:{},_debug:{},_globals:{}})(window.jQuery);(function(e){var c=R9.logger&&new R9.logger("framework/question");R9.publish("question",{_questionAnswerMap:{},answer:function(a,b){a=a.replace(/\./g,"_");this._questionAnswerMap.hasOwnProperty(a)&&console.error("Duplicate question name '"+a+"' is being overwritten.");"function"!==typeof b?console.error("Handler for answer is not a function"):this._questionAnswerMap[a]=b,ask:function(a,b){(a=a.replace(/\./g,"_"))|console.error("Missing question name - may cause weird stuff to happen");if(this._questionAnswerMap.hasOwnProperty(a)&&"function"===typeof this._questionAnswerMap[a])try{return this._questionAnswerMap[a].call({questionName:a},b)}catch(d){c.error("Error in question.ask ('"+a+"'),d,{questionName:a})}R9.events._debug&&console.warn("Missing question answer: '%s'. No component is registered to answer this question".format(a));return null},forget:function(a){a=a.replace(/\./g,"_");return this._questionAnswerMap.hasOwnProperty(a)?(delete this._questionAnswerMap[a],!0):!1}})(window.jQuery)(window.jQuery);(function(d){var b=!1;try{window.localStorage.setItem("vendor-support-test","success?"),window.localStorage.removeItem("vendor-support-test"),b=!0}catch(a){d.publish("storage",{get:function(a){if(b){a=localStorage.getItem(a);try{return JSON.parse(a)}catch(c){return a}}},set:function(a,c){try{b&&(null!=c&&"object"===typeof c?localStorage.setItem(a,JSON.stringify(c)):localStorage.setItem(a,c))}catch(e){}},remove:function(a){try{b&&localStorage.removeItem(a)}catch(c){}},clear:function(){b&&localStorage.clear()}}),isAvailable:function(){return b}})(R9);(function(g,c,e){var f=function(a){(new g.logger).error(Error(a));g.publish("template",{_parsedComponents:{},render:function(a,b){a=this.getTemplate(a);return e.render(a,b)}},renderElement:function(){return c(this.render.apply(this,arguments))},renderFromString:function(a,b,c){var d=this._parsedComponents[b];void 0===d&&(d=a,this._cacheParsedTemplate(d,b));return e.render(d,c)}},renderElementFromString:function(){return
```

(Id.).

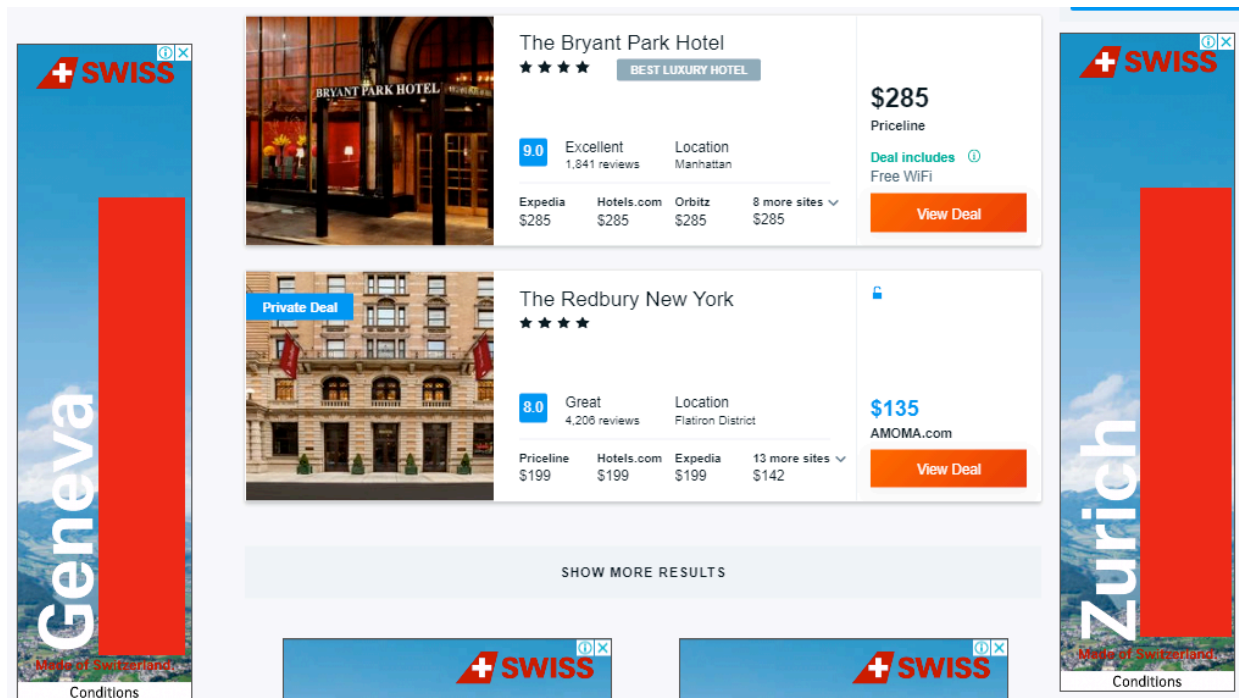
34. The Accused Instrumentality performs the step of receiving an advertisement selected in accordance to the user demographic information (e.g., Kayak.com provides advertisements to a user based on demographic information such as age, gender, language, interest, activity, etc.). (E.g., <https://www.kayak.com/privacy#collectinfo>; <https://www.kayak.com/privacy#trackingtools>). For example, the accused instrumentality has targeted advertising to users based on a user's geography and interest. (Id.).

35. The Accused Instrumentality performs the step of executing the template program (e.g., JavaScript templates) using the selected advertisement (e.g., an advertisement selected

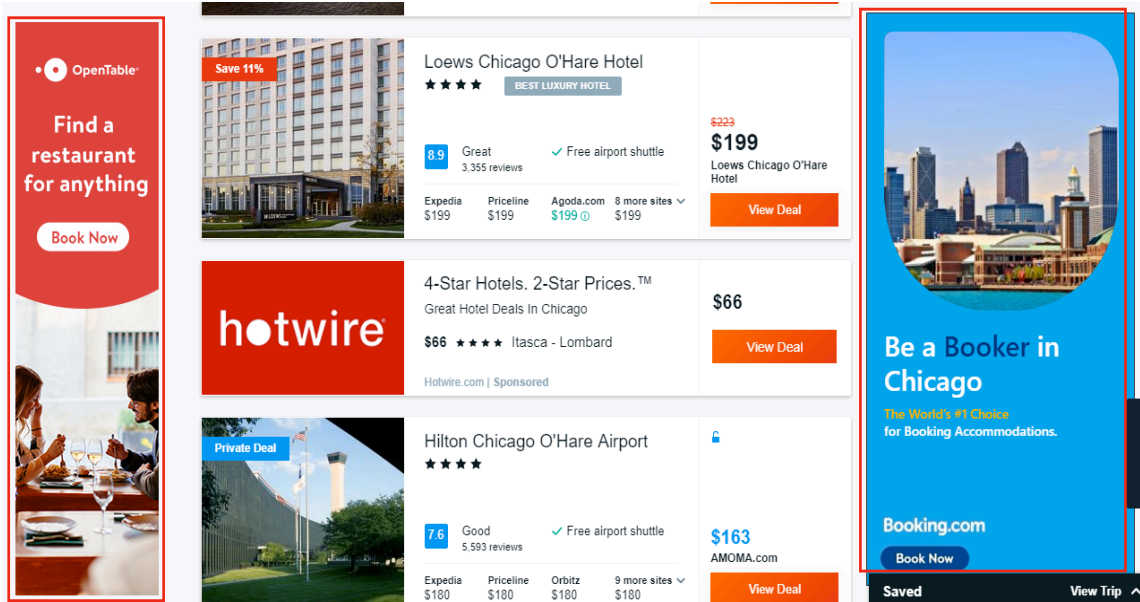
based on a user's demographic information) to generate the customized page (e.g., a user's Kayak.com page with the advertisement integrated). (E.g.,

https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

36. The Accused Instrumentality performs the step of providing the customized page to the user (e.g., a user's Kayak.com page with integrated advertisements).



(E.g., https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).



(E.g., https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

37. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '854 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

38. On information and belief, Defendant has had at least constructive notice of the '854 patent by operation of law, and there are no marking requirements that have not been complied with.

IV. COUNT II (PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 5,983,227)

39. Plaintiff incorporates the above paragraphs herein by reference.

40. On November 9, 1999, United States Patent No. 5,983,227 ("the '227 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '227 Patent

is titled “Dynamic Page Generator.” A true and correct copy of the ‘227 Patent is attached hereto as Exhibit B and incorporated herein by reference.

41. Digi Portal is the assignee of all right, title and interest in the ‘227 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘227 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘227 patent by Defendant.

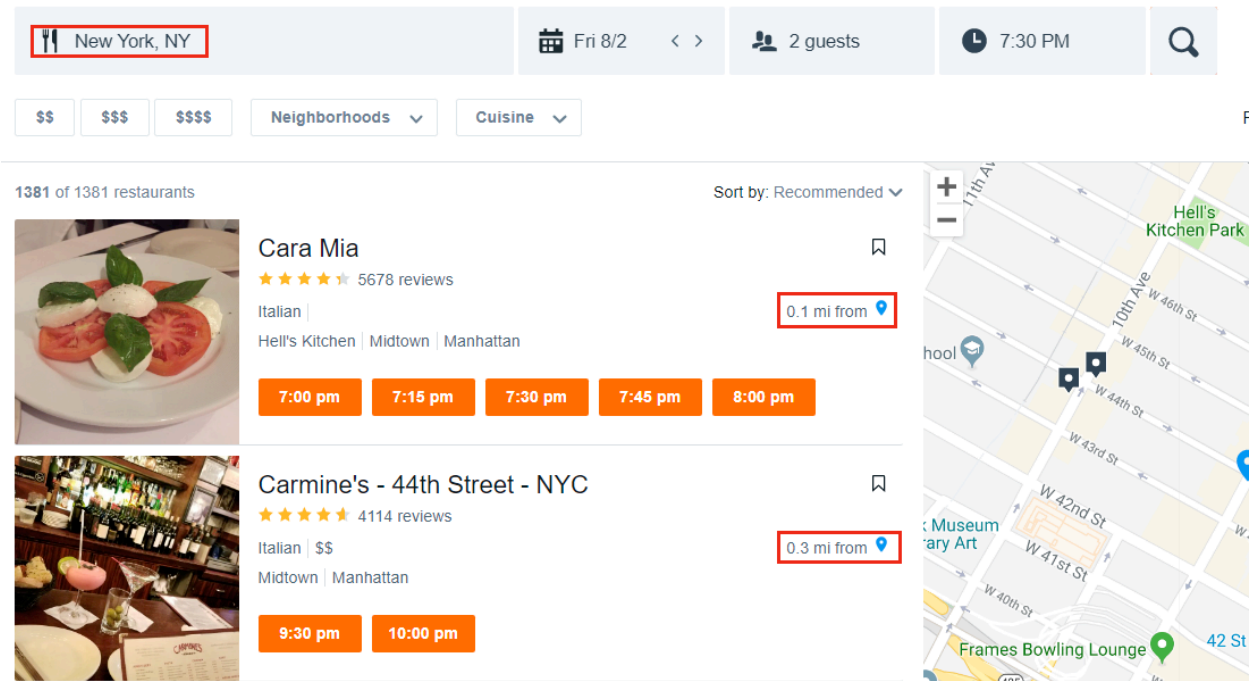
42. The application leading to the ‘227 patent was filed June 12, 1997. (Ex. B at cover). The ‘227 patent was first assigned to Yahoo! Inc. (*Id.*).

43. The invention in the ‘227 patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:14-18).

44. The ‘227 patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, as show in the prosecution history of the ‘227 patent, it was unconventional to download real-time information into a server and use a template for the static data as opposed to linking directly to real-time information. (Ex. E at 5, Ex. F at 2).

45. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 2 of the ‘227 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method of providing real-time responses to user requests for customized pages, including without limitation through the method implemented of providing a user’s Kayak.com page (“Accused Instrumentality”). (*E.g.*, <https://www.Kayak.com/profile/secure/login/?continue=%2F>).

46. The Accused Instrumentality performs the step of obtaining user preferences (e.g., location, timing, types of cuisines, etc.), wherein a user's user preferences indicate items of interest to that user. For example, users can customize their location on their Kayak.com page to find current restaurant and hotel deals near their location:



(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).


KAYAK
Part of Booking.com

Flights Hotels Cars Packages Cruises **Restaurants** More ▾

🍴 New York, NY 📅 Fri 8/23 < > 👤 2 guests ⌚ 7:00 PM 🔍


\$\$ \$\$\$ \$\$\$\$
 Neighborhoods ▾
 Cuisine ▾

1417 of 1417 restaurants Sort by: Recommended ▾



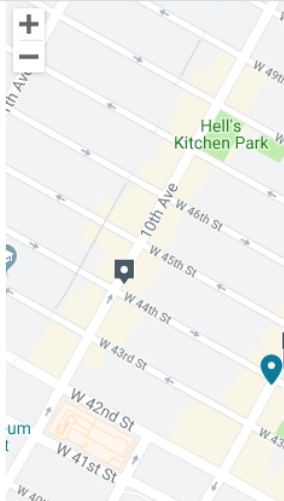
Cara Mia
★★★★☆ 5678 reviews
Italian | Hell's Kitchen | Midtown | Manhattan
0.1 mi from 📍

6:45 pm 7:00 pm 7:15 pm 7:30 pm




Carmine's - 44th Street - NYC
★★★★★ 4114 reviews
Italian | \$\$ | Midtown | Manhattan
0.3 mi from 📍

9:00 pm 9:30 pm




(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).


A user's Kayak.com page is customized by the location information provided by the user:



Cara Mia
★★★★☆ 5678 reviews
Italian |
Hell's Kitchen | Midtown | Manhattan
0.1 mi from [location icon]
7:00 pm 7:15 pm 7:30 pm 7:45 pm 8:00 pm



Carmine's - 44th Street - NYC
★★★★☆ 4114 reviews
Italian | \$\$
Midtown | Manhattan
9:30 pm 10:00 pm
0.3 mi from [location icon]



Becco
★★★★☆ 3042 reviews
Italian | \$\$
Hell's Kitchen | Midtown | Manhattan
5:00 pm 7:15 pm 7:30 pm 7:45 pm 8:00 pm
0.1 mi from [location icon]

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

47. The following screenshots are pages for two different users that have varying restaurant and hotel deals displayed based upon the users' respective locations:

First User:

Citizenm New York Bowery - New York, NY

Fri 8/2

Sat 8/3

Go to map

716 of 1995 hotels and homes

Sorted by Recommended

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

\$49 \$1095

Nightly base price

Freebies

☐ Free breakfast 267

☐ Free parking 93

☐ Free Internet 648

☐ Free cancellation 27

Citizenm New York Bowery

★★★★

9.2 Excellent
2,598 reviews

Location
Lower Manhattan

Hotels.com	citizenM	TripAdvisor	8 more sites
\$199	\$199	\$199	\$199

\$199
Expedia

Deal includes ①
Free WiFi

View Deal

YOUR FIRST CHOICE.

"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

Open to alternatives? We recommend these nearby hotels:

W New York - Downtown

★★★★

8.5 Great
1,270 reviews

Location
Financial District

Expedia	Booking.c...	AMOMA.c...	9 more sites
\$199	\$199	\$177	\$199

\$199
Priceline

View Deal

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

Chicago, IL

Sat 8/3 < > Sun 8/4 < >

281 of 749 hotels and homes Sorted by Recommended

Go to map

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

Save 19%

Palmer House a Hilton Hotel

★★★★

8.4 Great 10,125 reviews

Location Downtown Chicago

Hotels.com \$359 Priceline \$359 Orbitz \$359 9 more sites

\$443
\$359
Experia

View Deal

Chicago Marriott O'Hare

★★★ BEST BUSINESS HOTEL

\$169
Priceline

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a

(for a particular user)).

48. Additionally, a user can also customize the Kayak.com page by preferred hotel chains, so that the corresponding hotels can be displayed. The following are screenshots pertaining to the selection process:

Your brands

Airlines
Add airlines you prefer or would like to avoid

Preferred

Avoid

Hotel chains
Add hotel chains you prefer or would like to avoid

Preferred

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

Park Hyatt X


(<https://www.kayak.com/profile/preferences> (for a particular user)).


49. The following screenshots are webpages customized according to the selected hotel chains of two respective users:

First User:

Price Alerts

 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209	View
<input checked="" type="checkbox"/> Alerts ON	View in New York Trip			

	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235	View
<input checked="" type="checkbox"/> Alerts ON	View in New York Trip			

((<https://www.kayak.com/profile/notifications> (for a particular user))).

Second User:

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

JW Marriott
X

Search hotel chains



Suggested Hotel Chains



Aloft +

Cambria Suites +

((<https://www.kayak.com/profile/preferences> (for a particular user))).

Price Alerts [Create a Price Alert](#)

	Cambria Hotel Chicago Mag Mile 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$349	View
	Alerts ON	View in Chicago Trip		

	Aloft Chicago Downtown River North 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$259	View
	Alerts ON	View in Chicago Trip		

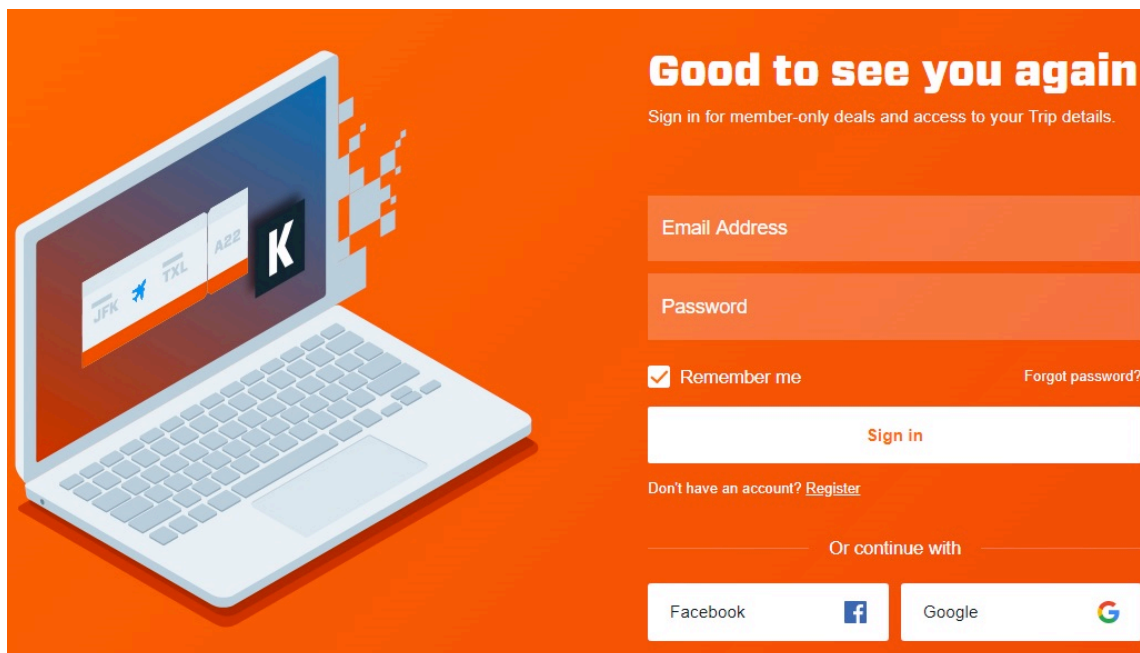
(<https://www.kayak.com/profile/preferences> (for a particular user)).

50. On information and belief, the Accused Instrumentality performs obtaining real-time information (*e.g.*, current restaurant and hotel listings and advertisements) from information sources (*e.g.*, Kayak.com's servers/databases which store real-time restaurant and hotel listings and the Google server which store advertisements) and storing the real-time information in a storage device (*e.g.*, restaurant and hotel listings, and advertisements will be pulled from a storage server and sent to Kayak.com's web/API server so that the information can be used as input in a template program to generate a customized page that is provided to a user).

51. On information and belief, the Accused Instrumentality performs the step of combining the user preferences for the user (*e.g.*, location, timing, types of cuisines) and a template (*e.g.*, generic template) to form a template program specific to the user. On information and belief, the Accused Instrumentality forms a template program (*e.g.*, software instructions and data used for rendering a particular user's Kayak.com page such as a JavaScript page) that is unique to the user (*e.g.*, JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user) and based on user preferences (*e.g.*, a user can

customize the content of their templates and what will be rendered and displayed using the templates by entering information such as their location). On information and belief, the Accused Instrumentality uses preference information for the user and a global template that is generic to a plurality of users to form a customized template program unique to a user. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage.

52. On information and belief, the Accused Instrumentality performs the step of receiving, from a user and at the server, a user request for a customized page (*e.g.*, when a user logs in to Kayak.com, hotel and restaurant searches will be limited to a user's location, preferred hotel chains, and advertisements will be targeted towards a user's interest) customized according to the user preferences. The following screenshots are examples of the request for a customized page that is customized according to the user preferences:



(<https://www.Kayak.com/profile/secure/login/?continue=%2F> (for a particular user)).

New York, NY

Fri 8/2

<

>

2 guests

7:30 PM

\$\$

\$\$\$


\$\$\$\$

Neighborhoods

Cuisine

1381 of 1381 restaurants

Sort by: Recommended



Cara Mia

★★★★☆ 5678 reviews

Italian

Hell's Kitchen | Midtown | Manhattan

0.1 mi from


7:00 pm

7:15 pm

7:30 pm

7:45 pm

8:00 pm



Carmine's - 44th Street - NYC

★★★★☆ 4114 reviews

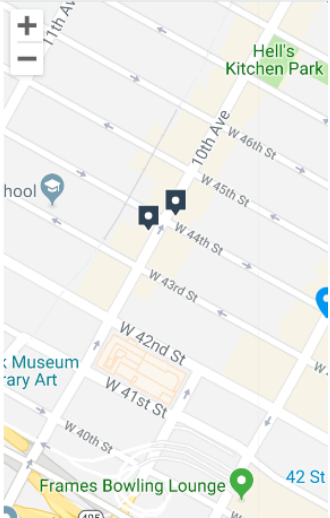
Italian | \$\$

Midtown | Manhattan

0.3 mi from


9:30 pm

10:00 pm



(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

35



Cara Mia


★★★★★ 5678 reviews

Italian |

Hell's Kitchen | Midtown | Manhattan

0.1 mi from

7:00 pm7:15 pm7:30 pm7:45 pm8:00 pm



Carmine's - 44th Street - NYC


★★★★★ 4114 reviews

Italian | \$\$

Midtown | Manhattan

0.3 mi from

9:30 pm10:00 pm



Becco

★★★★★ 3042 reviews

Italian | \$\$

Hell's Kitchen | Midtown | Manhattan

0.1 mi from

5:00 pm7:15 pm7:30 pm7:45 pm8:00 pm

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

Your brands

Airlines

Add airlines you prefer or would like to avoid

Preferred

Avoid

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

Hotel chains


Add hotel chains you prefer or would like to avoid



Preferred

Park Hyatt X

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209	View
<input checked="" type="checkbox"/>	Alerts ON	View in New York Trip		
	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235	View
<input checked="" type="checkbox"/>	Alerts ON	View in New York Trip		

(<https://www.kayak.com/profile/notifications> (for a particular user)).

53. The Accused Instrumentality performs the step of executing the template program specific to the user (*e.g.*, page generation code, tiles, containers, and user data) using the real-time information stored in the storage device (*e.g.*, hotel and restaurant listings, and advertisements, stored in a storage database/server) as input to the template program to generate the customized page (*e.g.*, the hotel and restaurant listings, and advertisements will be inputted into a template program so that the appropriate web page will be generated and displayed to the user). The following sets of screen screenshots are examples of customizing a user's Kayak.com page from two different users that have varying current restaurant and hotel deals displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user).

First User:

Citizenm New York Bowery - New York, NY Fri 8/2 Sat 8/3

716 of 1995 hotels and homes Sorted by Recommended

Go to map

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

\$49 \$1095

Nightly base price

Freebies

- ☐ Free breakfast 267
- ☐ Free parking 93
- ☐ Free Internet 648
- ☐ Free cancellation 37

Citizenm New York Bowery
★★★★

9.2 Excellent
2,598 reviews

Location
Lower Manhattan

Hotels.com	citizenM	TripAdvisor	8 more sites
\$199	\$199	\$199	\$199

\$199
Expedia

Deal includes ①
Free WiFi

View Deal

YOUR FIRST CHOICE.
"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

Open to alternatives? We recommend these nearby hotels:

W New York - Downtown
★★★★

8.5 Great
1,270 reviews

Location
Financial District

Expedia	Booking.c...	AMOMA.c...	9 more sites
\$199	\$199	\$177	\$199

\$199
Priceline

View Deal

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

Chicago, IL

Sat 8/3 < > Sun 8/4 < >

281 of 749 hotels and homes Sorted by Recommended

Go to map

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

Save 19%

Palmer House a Hilton Hotel

★★★★

8.4 Great 10,125 reviews

Location Downtown Chicago

Hotels.com \$359 Priceline \$359 Orbitz \$359 9 more sites

\$443 **\$359** Expedia

View Deal

Chicago Marriott O'Hare

★★★ BEST BUSINESS HOTEL

\$169 Priceline

Used Cars for Sale in Elk Grove Village, IL

Search Used Search New

By Car By Body Style By Price

All Makes

All Models

All to All

ZIP 60007

Radius 50 mi

Search

Price Search

Save Search

Email me price drops and new listings for these results. Subscribe

Best deals first

Showing 1 - 15 out of 2000 listings Next

Sponsored

2019 Chrysler 300 S RWD

GREAT DEAL

\$2,907 BELOW CarGurus IMV of \$25,698

Price: \$22,791 \$424/mo est.*

Mileage: 18,767 mi

St. Charles Chrysler Dodge Jeep Ram

ST. CHARLES


★ 3.6 (630) 866-5639

St Charles, IL (17 mi)

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a

(for a particular user)).


First User:



Geneva

Made of Switzerland

Conditions



The Bryant Park Hotel

★★★★ BEST LUXURY HOTEL

9.0 Excellent
1,841 reviews

Location
Manhattan

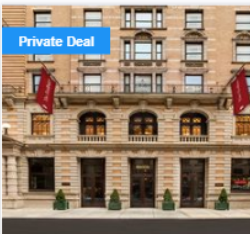
Expedia	Hotels.com	Orbitz	8 more sites
\$285	\$285	\$285	\$285

\$285

Priceline

Deal includes Free WiFi

View Deal



Private Deal

The Redbury New York

★★★★

8.0 Great
4,208 reviews

Location
Flatiron District


Priceline	Hotels.com	Expedia	13 more sites
\$199	\$199	\$199	\$142

\$135

AMOMA.com

View Deal


SHOW MORE RESULTS




Zurich

Made of Switzerland


Conditions





(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

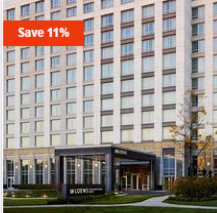
Second User:



OpenTable

Find a restaurant for anything

Book Now



Save 11%

Loews Chicago O'Hare Hotel

★★★★ BEST LUXURY HOTEL

8.9 Great
3,355 reviews

✓ Free airport shuttle


Expedia	Priceline	Agoda.com	8 more sites
\$199	\$199	\$199	\$199

~~\$223~~

\$199

Loews Chicago O'Hare Hotel

View Deal



4-Star Hotels. 2-Star Prices.™

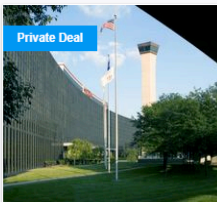
Great Hotel Deals In Chicago

\$66 ★★★★★ Itasca - Lombard

Hotwire.com | Sponsored

\$66

View Deal



Private Deal

Hilton Chicago O'Hare Airport

★★★★

7.6 Good
5,593 reviews


✓ Free airport shuttle

Expedia	Priceline	Orbitz	9 more sites
\$180	\$180	\$180	\$180

\$163

AMOMA.com

View Deal



Be a Booker in Chicago

The World's #1 Choice for Booking Accommodations.

Booking.com

Book Now

Saved View Trip



41



(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

First User:

Price Alerts

 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209	View
	Alerts ON	View in New York Trip		

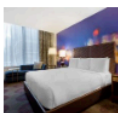

	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235	View
	Alerts ON	View in New York Trip		



(<https://www.kayak.com/profile/notifications> (for a particular user)).

Second User:

Price Alerts

 [Create a Price Alert](#)

	Cambria Hotel Chicago Mag Mile 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$349	View
	Alerts ON	View in Chicago Trip		

	Aloft Chicago Downtown River North 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$259	View
	Alerts ON	View in Chicago Trip		

(<https://www.kayak.com/profile/notifications> (for a particular user)).

54. The Accused Instrumentality performs the step of providing the customized page to the user (*e.g.*, a user's Kayak.com page, search results, etc. with integrated advertisements) wherein the steps of executing and providing are performed in real-time response to receipt of the user request in the step of receiving (*e.g.*, user login request, search initiation, etc.) and wherein the customized page includes at least one item of real-time information (*e.g.*, current hotel and restaurant listings or current advertisements selected from the storage device (*e.g.*, pulled from storage servers/databases and sent to an API/webserver for processing/display). (*E.g.*, screenshots in paragraphs 52 and 53).

55. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '227 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

56. On information and belief, Defendant has had at least constructive notice of the '227 patent by operation of law, and there are no marking requirements that have not been complied with.

V. COUNT III
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,171,414)

57. Plaintiff incorporates the above paragraphs herein by reference.

58. On January 30, 2007, United States Patent No. 7,171,414 ("the '414 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '414 Patent is titled "Dynamic Page Generator." A true and correct copy of the '414 Patent is attached hereto as Exhibit G and incorporated herein by reference.

59. Digi Portal is the assignee of all right, title and interest in the ‘414 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘414 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘414 Patent by Defendant.

60. The application leading to the ‘414 patent was filed September 10, 1999, which was a continuation of application no. 08/873,975, which issued as the ’227 patent. (Ex. G at cover). The ‘414 patent was first assigned to Yahoo! Inc. (*Id.*).

61. The invention in the ‘414 patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:29-33).

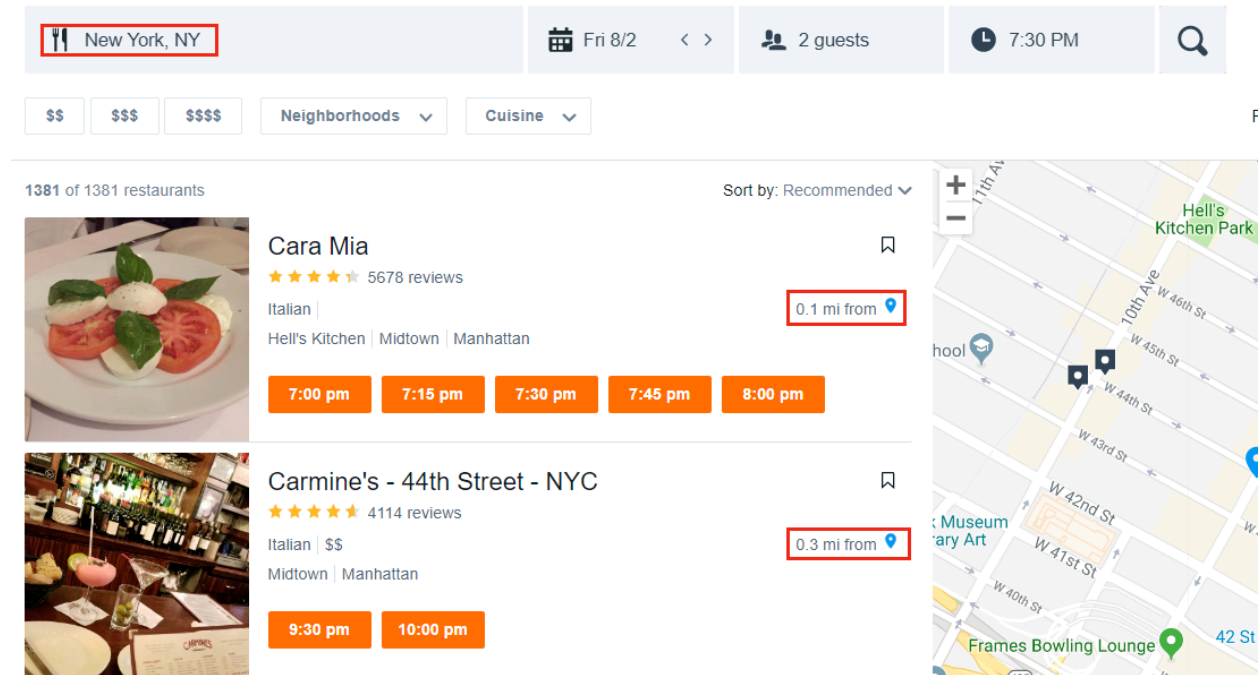
62. The ‘414 patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the ‘414 patent highlights advantages and unconventional features of the claimed invention including the “storing real-time information in a shared local storage device.” An example of this limitation is when live data used to fill templates is stored local to the page server which is handling user requests for custom web pages. (Ex. I at 8; Ex. G at col. 2:11-15). Every piece of information that a person can request on a page is storable in a shared memory closely coupled to a page generator. (Ex. I at 9; Ex. G at col. 4:43-58). Unlike the prior art CGI process that required time consuming calls to other servers, storing real-time information in a shared local storage device, allows for any custom page to be built within the page server thereby eliminating the need to make requests from other servers for portions of the live data. (Ex. I at 9; Ex. G at col. 2:25-31).

63. Furthermore, as show in the prosecution history of the ‘414 Patent, it was unconventional to receive the template program from one of at least two location, the frequency of the user request for the customized page determines the retrieval location of the template program. (Ex. H at 9-10). In the prior art, the published web site was stored on a server and provided from one server location regardless of the frequency of the user requests for the web site. (*Id.*). The examiner agreed that the claim was allowable because the prior art did not disclose that in a page server coupled to a network a method of providing a customized page to a user, the customized page is customized according to the user’s preferences, and the template is received from one of at least two locations, the location determined from frequency of the user request for the customized page. (Ex. J at 3).

64. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 3 of the ‘414 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method using the Kayak.com website (“Accused Instrumentality”). The Accused Instrumentality uses a page server (*e.g.*, the Kayak.com server), to provide a customized page (*e.g.*, user-specific web page, search results, etc.) to a user, wherein the customized page is customized according to the user's preferences (*e.g.*, user location, user interests, etc.).


65. On information and belief, the Accused Instrumentality performs the step of obtaining real-time information (*e.g.*, current hotel and restaurant listings and advertisements) from information sources (*e.g.*, storage servers/databases that store hotel and restaurant listings, and advertisements) and stores them in a shared local storage device (*e.g.*, the data will be pulled from storage servers/databases and stored, at least temporarily, at a local web/API server, for processing and subsequent display to a user).

66. For example, users can customize their location on their Kayak.com page to find real-time hotel and restaurant deals near their location:



([https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-](https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a)

[02/1930/2guests?sort=rank_a](https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a) (for a particular user)). Furthermore, a user's Kayak.com page is customized by the location information provided by the user:




Cara Mia

★★★★☆ 5678 reviews

Italian |

Hell's Kitchen | Midtown | Manhattan

0.1 mi from 


7:00 pm

7:15 pm

7:30 pm

7:45 pm

8:00 pm




Carmine's - 44th Street - NYC

★★★★☆ 4114 reviews


Italian | \$\$

Midtown | Manhattan

0.3 mi from 

9:30 pm

10:00 pm




Becco

★★★★☆ 3042 reviews

Italian | \$\$

Hell's Kitchen | Midtown | Manhattan

0.1 mi from 

5:00 pm

7:15 pm

7:30 pm

7:45 pm

8:00 pm

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

67. As another example, a user's Kayak.com page will also be customized to show current restaurant and hotel deals near the location linked to a user's account.

First User:

Citizenm New York Bowery - New York, NY

Fri 8/2

Sat 8/3

Go to map

716 of 1995 hotels and homes

Sorted by Recommended

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

\$49 \$1095

Nightly base price

Freebies

☐ Free breakfast 267

☐ Free parking 93

☐ Free Internet 648

☐ Free cancellation 22

Citizenm New York Bowery

★★★★

9.2 Excellent 2,598 reviews

Location Lower Manhattan

Hotels.com	citizenM	TripAdvisor	8 more sites
\$199	\$199	\$199	\$199

YOUR FIRST CHOICE.

"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

\$199

Expedia

Deal includes Free WiFi

View Deal

Open to alternatives? We recommend these nearby hotels:

W New York - Downtown

★★★★

8.5 Great 1,270 reviews

Location Financial District

Expedia	Booking.c...	AMOMA.c...	9 more sites
\$199	\$199	\$177	\$199

\$199

Priceline

View Deal

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

Chicago, IL

Sat 8/3 < > Sun 8/4 < > 🔍

281 of 749 hotels and homes Sorted by Recommended

Go to map

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

Palmer House a Hilton Hotel

★★★★

8.4 Great 10,125 reviews

Location Downtown Chicago

Hotels.com \$359 Priceline \$359 Orbitz \$359 9 more sites

Save 19%

\$443
\$359
Expedia

View Deal

Chicago Marriott O'Hare

★★★ BEST BUSINESS HOTEL

\$169
Priceline

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)). A user can also customize their Kayak.com page by selecting their preferred hotel chains, so that the corresponding hotels can be displayed.

Your brands

Airlines

Add airlines you prefer or would like to avoid

Preferred

🔍 ame

Avoid

🔍 Search airlines

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

🔍 Search hotel chains


(<https://www.kayak.com/profile/preferences> (for a particular user)).

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred


Park Hyatt X

 Search hotel chains




(<https://www.kayak.com/profile/preferences> (for a particular user)).

68. On information and belief, the Accused Instrumentality performs the step of storing a user-specific template program (*e.g.*, generic template customized to a user-specific template program based on user-specific interests and with real-time information) for the user in a data structure associated with a user identifier unique to the user (*e.g.*, the user-specific template is stored corresponding to every user based on the user's unique preferences and information associated with the user's sign-in information (*e.g.*, e-mail address)). Upon information and belief, after a user logs in, Kayak.com can display a user's saved/recent searches. As such, a user-specific template program utilized to create the displayed websites that show a user's recent searches must be stored in a database wherein the template program is tied to a user's log in information/account.

Recently searched

Show: [All history](#) 

[Delete all history](#)

	New York, NY	Wed, 08/28 – Thu, 08/29	1 room, 2 guests	>
	New York, NY	Fri, 08/23 – Sat, 08/24	1 room, 2 guests	>
	The Renwick Hotel New York City, Curio Colle...	Wed, 08/28 – Thu, 08/29	1 room, 2 guests	>
	Andaz Wall Street \$236			>
	Sanctuary Hotel New York \$254			>

(<https://www.kayak.com/profile/dashboard> (for a particular user)).

69. A user can also customize their Kayak.com page by selecting their preferred hotel chains, so that the corresponding hotels can be displayed. Upon information and belief, in order to display the preferred hotel chains of interest to a user following their login, Kayak.com must store the template programs utilized to render the pages in a database, and tie the template programs to a user's account. Below are screenshots pertaining to the selection process:

Your brands

Airlines
Add airlines you prefer or would like to avoid

Preferred

Q ame

Avoid

Q Search airlines

Hotel chains
Add hotel chains you prefer or would like to avoid

Preferred

Q Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

Park Hyatt X

Q Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)). The following the screenshots of webpages customized according to the selected hotel chains of two respective users:

First User

Hotel chains



Add hotel chains you prefer or would like to avoid

Preferred

Park Hyatt X

Search hotel chains

<https://www.kayak.com/profile/preferences> (for a particular user).
Price Alerts
 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209
<input checked="" type="checkbox"/> Alerts ON			View in New York Trip
	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235
<input checked="" type="checkbox"/> Alerts ON			View in New York Trip

<https://www.kayak.com/profile/notifications> (for a particular user).

Second User

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

JW Marriott X

Search hotel chains


Suggested Hotel Chains


Aloft +

Cambria Suites +

<https://www.kayak.com/profile/preferences> (for a particular user).

Price Alerts [Create a Price Alert](#)

 <div> Cambria Hotel Chicago Mag Mile Delete </div> <div> 8/3 - 8/4 Chicago, IL </div> <div> 2 guests, 1 room </div>	<div> \$349 </div> <div> View </div>
<div> <input checked="" type="checkbox"/> Alerts ON </div>	View in Chicago Trip

 <div> Aloft Chicago Downtown River North Delete </div> <div> 8/3 - 8/4 Chicago, IL </div> <div> 2 guests, 1 room </div>	<div> \$259 </div> <div> View </div>
<div> <input checked="" type="checkbox"/> Alerts ON </div>	View in Chicago Trip

(<https://www.kayak.com/profile/preferences> (for a particular user)).

70. Upon information and belief, the Accused Instrumentality performs the step of receiving, from the user and at the page server (*e.g.*, Kayak.com server), a user request (*e.g.*, user login, search initiation, etc.) for a customized page (*e.g.*, search results limited to a user's location, display of hotels tied to a user's preferred hotel chains, pages with advertisements targeted to a user's interest, etc.) and determining a user identifier associated with the request (*e.g.*, in order to limited search results to a location tied to an account, or display hotels related to a user's preferred hotel chains, Kayak must determine a user identifier that links the request to the user's account and preferences).

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

54

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

Citizenm New York Bowery - New York, NY Fri 8/2 Sat 8/3 🔍

716 of 1995 hotels and homes Sorted by Recommended ▾

Citizenm New York Bowery
★★★

9.2 Excellent
2,598 reviews

Location
Lower Manhattan

\$199
Expedia
Deal includes ①
Free WiFi
View Deal

Hotels.com \$199 citizenM \$199 TripAdvisor \$199 8 more sites ▾ \$199

YOUR FIRST CHOICE.
"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

Open to alternatives? We recommend these nearby hotels:

W New York - Downtown
★★★

8.5 Great
1,270 reviews

Location
Financial District

\$199
Priceline
View Deal

Expedia \$199 Booking.c... \$199 AMOMA.c... \$177 9 more sites ▾ \$199

Go to map

Stars
0+ 2 3 4 5

Review score
0+ 6+ 7+ 8+ 9+


Price
\$49 \$1095


Nightly base price ▾

Freebies
☐ Free breakfast 267
☐ Free parking 93
☐ Free Internet 648
☐ Free cancellation 97

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Price Alerts
 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209	View
<input checked="" type="checkbox"/>	Alerts ON	View in New York Trip		

	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235	View
<input checked="" type="checkbox"/>	Alerts ON	View in New York Trip		

(<https://www.kayak.com/profile/notifications> (for a particular user)).

71. On information and belief, the Accused Instrumentality performs the step of receiving a template program specific to the user using the determined user identifier (*e.g.*, user id & password) associated with the user request (*e.g.*, user login request). On information and belief, in order to display a webpage that shows search results limited to a user's location, saved/recent searches, and hotels tied to a user's preferred hotel chains, Kayak.com must receive a template program (*e.g.*, code, instructions, etc., used to create a webpage for display) tied to a user's account/preferences.

KAYAK Part of Booking.com

Flights Hotels Cars Packages Cruises Deals More ▾

Trips gtf32471 ▾

1 room, 2 guests ▾

New York, NY Wed 8/28 < > Thu 8/29 < >

Set Price Alert

891 of 2045 hotels and homes Sorted by Recommended ▾

Your filters ▾

☐ Excellent (9+)

Stars ▾

0+ 1 2 3 4 5

Review score ▾

0+ 6+ 7+ 8+ 9+

The Frederick Hotel ★★★★★

8.5 Great 2,229 reviews Location Lower Manhattan

Hotels.com \$155 Expedia \$155 Orbitz \$155 11 more sites ▾

\$155 Priceline

Deal includes Free WiFi

View Deal

Sanctuary Hotel New York ★★★★★

8.1 Great 2,001 reviews Location Manhattan

\$199 Priceline

Deal includes Free breakfast Free WiFi

Get notifications

Saved View Trip ▾

The Bernic Hotel New York City, Tapestry Collection by Hilton ★★★★★

Wed 8/28 - Thu 8/29 See full details

Alerts **\$268** Priceline **Book**

(https://www.kayak.com/hotels/New-York,NY-c15830/2019-08-28/2019-08-29/2adults?sort=rank_a (for a particular user)).

Recently searched

Show: All history ▾

Delete all history

	New York, NY	Wed, 08/28 – Thu, 08/29	1 room, 2 guests	>
	New York, NY	Fri, 08/23 – Sat, 08/24	1 room, 2 guests	>
	The Renwick Hotel New York City, Curio Colle...	Wed, 08/28 – Thu, 08/29	1 room, 2 guests	>
	Andaz Wall Street \$236			>
	Sanctuary Hotel New York \$254			>

(<https://www.kayak.com/profile/dashboard> (for a particular user)).

Citizenm New York Bowery - New York, NY

Fri 8/2

Sat 8/3

Go to map

716 of 1995 hotels and homes

Sorted by Recommended

Citizenm New York Bowery
 ★ ★ ★ ★

9.2 Excellent
 2,598 reviews

Location
 Lower Manhattan

\$199
 Expedia
 Deal includes ①
 Free WiFi

View Deal

Hotels.com \$199 citizenM \$199 TripAdvisor \$199 8 more sites \$199

YOUR FIRST CHOICE.
 "great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

\$49 \$1095

Nightly base price

Freebies

☐ Free breakfast 267
☐ Free parking 93
☐ Free Internet 648
☐ Free cancellation 27

Open to alternatives? We recommend these nearby hotels:

W New York - Downtown
 ★ ★ ★ ★

8.5 Great
 1,270 reviews

Location
 Financial District

\$199
 Priceline

View Deal

Expedia \$199 Booking.c... \$199 AMOMA.c... \$177 9 more sites \$199

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Chicago, IL

Sat 8/3

Sun 8/4

Go to map

281 of 749 hotels and homes

Sorted by Recommended

Palmer House a Hilton Hotel
 ★ ★ ★ ★

8.4 Great
 10,125 reviews

Location
 Downtown Chicago

\$359
 Expedia
 Save 19%

View Deal

Hotels.com \$359 Priceline \$359 Orbitz \$359 9 more sites \$359

Chicago Marriott O'Hare
 ★ ★ ★ ★
 BEST BUSINESS HOTEL

\$169
 Priceline


(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

Hotel chains

Add hotel chains you prefer or would like to avoid


Preferred





Park Hyatt X

 Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209	View
	Alerts ON	View in New York Trip		
	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235	View
	Alerts ON	View in New York Trip		

(<https://www.kayak.com/profile/notifications> (for a particular user)).

72. On information and belief, the Accused Instrumentality performs the step that the template program is received from one of at least two locations (*e.g.*, main storage at the Kayak.com server or local storage on the user's computer), the location determined from frequency of the user request for the customized page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in storage on the user's computer. Running

the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available hotels and restaurants, other site logic-based conditions. On information and belief, the template information is stored in multiple locations: (1) at runtime, in a Javascript object with the data structure called Context Data; (2) within browser local storage; and (3) browser cookies.

73. On information and belief, the Accused Instrumentality performs the step of executing the template program (*e.g.*, code, instructions, etc.) specific to the user (*e.g.*, used to create a user-specific web page) using the real-time information (*e.g.*, current hotels and restaurant deals, targeted advertisements, etc.) stored in the shared local storage device (*e.g.*, hotel listings and advertisements are pulled from storage servers/databases and sent to a web/API server used to process the data for display; the web/API server is local to Kayak and is shared amongst all users accessing the Kayak.com website) to generate the customized page (*e.g.*, a user webpage displaying hotel listings, hotel listings based on preferred hotel chains, etc., customized for a user based on their preferences). For example, the screenshots in Paragraph 71 are for two different users that have varying current hotel deals displayed based upon the users' respective locations and preferred hotels (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current hotel deals).

74. On information and belief, the Accused Instrumentality performs the step that the template program indicates items of interest (*e.g.*, hotel listings related to the user location, hotels are listed related to a user's preferred hotels, advertisements tied to a user's interest, etc.) to the user; and providing the user with the customized page (*e.g.*, user-specific web page). Users

have varying current hotel and restaurant deals displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current hotel and restaurant deals).

75. On information and belief, the Accused Instrumentality performs the step of receiving user preferences (*e.g.*, user location/hotel chains, etc.) for the user, wherein the user preferences indicate the items of interest to the user (*e.g.*, hotel and restaurant listings related to the user location, hotel listings related to a user's preferred hotel chain, advertisements tied to a user's interest, etc.) and combining the user preferences with a generic template to form the template program specific to the user. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared amongst all users, however the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a generic template that only defines layout and combining the data specific to user's interests to be displayed within the layout. (*E.g.*, screenshots in paragraph 71).

76. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '414 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

77. On information and belief, Defendant has had at least constructive notice of the '414 patent by operation of law, and there are no marking requirements that have not been complied with.

VI. COUNT IV
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,565,359)

78. Plaintiff incorporates the above paragraphs herein by reference.

79. On July 21, 2009, United States Patent No. 7,565,359 ("the '359 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '359 Patent is titled "Dynamic Page Generator." A true and correct copy of the '359 Patent is attached hereto as Exhibit K and incorporated herein by reference.

80. Digi Portal is the assignee of all right, title and interest in the '359 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '359 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '359 Patent by Defendant.

81. The application leading to the '359 patent was filed January 22, 2007, as a continuation of application no. 09/393,718, which issued as the '414 patent, which was a continuation of application no. 08/873,975, which issued as the '227 patent. (Ex. K at cover). The '359 patent was first assigned to Yahoo! Inc. (*Id.*).

82. The invention in the '359 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:22-27).

83. The '359 Patent shares the identical specification as the '854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25.

Furthermore, the prosecution history of the '359 patent highlights advantages and the unconventional features of the claimed invention. When allowing the claims of the '359 patent, the examiner focused on the last two limitations of the claim stating that executing the template program specific to the user using the real-time information stored in the shared local storage device to generate a customized page; and receiving user preferences for the user, and combining the user preferences with a generic template to form the template specific to the user, wherein the user preferences indicate the items of interest to the user in conjunction with the other limitations was not found in the prior art. (Ex. L at 8).

84. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 10 of the '359 patent in Delaware, and elsewhere in the United States, by performing actions comprising making and/or using the claimed computer-readable medium comprising instructions for generating customized pages that are customized according to user preferences that performs the method steps required by the claim, including without limitation through the method implemented of providing a user's Kayak.com page ("Accused Instrumentality"). The Accused Instrumentality utilizes a computer-readable medium comprising instructions (*e.g.*, code that is executed to create webpages) for generating customized pages (*e.g.*, user-specific web pages), wherein the customized pages are customized according to user preferences (*e.g.*, web pages will be customized to show hotel and restaurant listings near a user's location, hotel listings related to a user's preferred hotel chains, advertisements targeted to a user's interest, etc.).

85. On information and belief, the Accused Instrumentality performs the step of storing the real-time information in a shared local storage device (*e.g.*, hotel and restaurant listings, hotel listings based on preferred hotel chains, and advertisements will be pulled from a

storage server/database and sent to a Kayak.com local web/API server for processing and display). On information and belief, the Accused Instrumentality also performs the step of storing a user-specific template program (*e.g.*, instructions and data used to generate a custom user webpage) for a plurality of users, wherein each template program indicates items of interest to a user (*e.g.*, each user's template program will include instructions, code, etc. that dictates the information that should be displayed for a user based on their interest), and is associated with a user identifier (*e.g.*, in order for a user to see information specific to them and their account, such as recent searches, the template program for their webpage must be tied to their login credentials), wherein the user identifier is associated with a user request (*e.g.*, user login and subsequent search request, navigation, etc.) for a customized page.

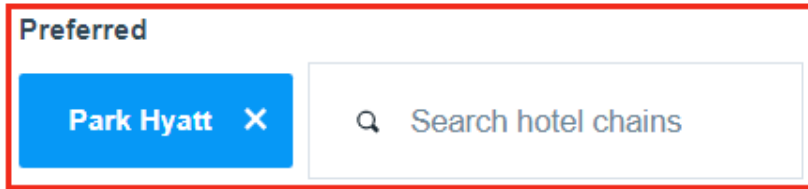
86. For example, after a user logs in, Kayak.com displays a user's recent searches and preferred hotel chains, and therefore a user-specific template program utilized to create the displayed websites that show a user's recent searches and preferred hotel chains must be tied to a user's log in information/account.



(<https://www.kayak.com/profile/dashboard> (for a particular user)).

Hotel chains

Add hotel chains you prefer or would like to avoid



Preferred

Park Hyatt X

Search hotel chains

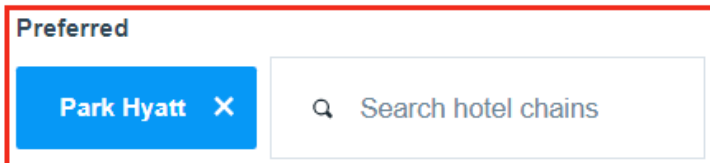
(<https://www.kayak.com/profile/preferences> (for a particular user)).

87. For example, a user can also customize their Kayak.com page by selecting their preferred hotel, so that preferred hotels in searches can be displayed. In order to display the preferred hotel search results to a user following their login, Kayak.com must tie the template programs to a user's account.

First User:

Hotel chains

Add hotel chains you prefer or would like to avoid




Preferred


Park Hyatt X

Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	<div>\$209</div> <div>View</div>
<input checked="" type="checkbox"/> Alerts ON			View in New York Trip


	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	<div>\$235</div> <div>View</div>
<input checked="" type="checkbox"/> Alerts ON			View in New York Trip


(<https://www.kayak.com/profile/notifications> (for a particular user)).

Second User:


Hotel chains
Add hotel chains you prefer or would like to avoid


Preferred

JW Marriott 

 Search hotel chains


Suggested Hotel Chains


Aloft 

Cambria Suites 

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts [Create a Price Alert](#)

	Cambria Hotel Chicago Mag Mile 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$349	View
<input checked="" type="checkbox"/> Alerts ON			View in Chicago Trip	


	Aloft Chicago Downtown River North 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete	\$259	View
<input checked="" type="checkbox"/> Alerts ON			View in Chicago Trip	

(<https://www.kayak.com/profile/preferences> (for a particular user)).


88. For example, a user's Kayak.com page will also be customized to display hotel and restaurant listings that are near a user's location.


First User:

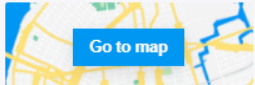
Citizenm New York Bowery - New York, NY

 Fri 8/2

< >

 Sat 8/3





Go to map

Stars

0+

2

3

4

5

Review score

0+

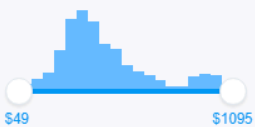
6+

7+

8+

9+

Price



\$49
\$1095

Nightly base price

Nightly base price
v


Freebies

☐ Free breakfast
☐ Free parking
☐ Free Internet
☐ Free cancellation

267
 93
 648
 27

716 of 1995 hotels and homes

Sorted by Recommended v



Citizenm New York Bowery
★★★★

9.2

Excellent
2,598 reviews

Location
Lower Manhattan

Hotels.com	citizenM	TripAdvisor	8 more sites v
\$199	\$199	\$199	\$199

YOUR FIRST CHOICE.

"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna


\$199

Expedia

Deal includes ①
Free WiFi

View Deal

Open to alternatives? We recommend these nearby hotels:



W New York - Downtown
★★★★

8.5

Great
1,270 reviews

Location
Financial District

Expedia	Booking.c...	AMOMA.c...	9 more sites v
\$199	\$199	\$177	\$199

\$199

Priceline

View Deal

https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

89. For example, the JavaScript code below was retrieved from browser developer tools. Based on user data, the code is managing various Kayak.com data based on user preferences such as location.

```
a.removeEventListener("load",R),r.ready()){"complete"===d.readyState||"loading"!==d.readyState&&!d.documentElement.doScroll?a.setTimeout(r.ready):(d.addEventListener("DOMContentLoaded",R),a.addEventListener("load",R));var S=function(a,b,c,d,e,f,g){var h=0,i=a.length,j=null==c;if("object"===r.type(c)){e=!0;for(h in c)S(a,b,h,c[h],!0,f,g)}else if(void 0!==d&&(e=!0,r.isFunction(d))){g=!0,j&&(g?b.call(a,d,b,null):(j=b,b=function(a,b,c){return j.call(r(a,c))}),b)}for(h;i;h++)b(a[h],c,g?d.call(a[h],h,b(a[h],c))):return e?a:j?b.call(a,i?b(a[0],c):f),T=function(a){return 1===a.nodeType||9===a.nodeType||+a.nodeType};function U(){this.expando=r.expando+U.uid++}U.uid=1,U.prototype={cache:function(a){var b=a[this.expando];return b||(b={},T(a)&&(a.nodeType?a[this.expando]=b:Object.defineProperty(a,this.expando,{value:b,configurable:!0}))),b},set:function(a,b,c){var d,e=this.cache(a);if("string"===typeof b[e[r.camelCase(b)]=c;else for(d in b)e[r.camelCase(d)]=b[d];return e},get:function(a,b){return void 0===b?this.cache(a):a[this.expando]&&a[this.expando][r.camelCase(b)],access:function(a,b,c){return void 0===b||b&&"string"===typeof b&&void 0===c?this.get(a,b):(this.set(a,b,c),void 0!==c?c:b)},remove:function(a,b){var c,d=a[this.expando];if(void 0!==d){if(void 0!==(b=r.isArray(b)?b:b.map(r.camelCase):(b=r.camelCase(b),b=b in d?[b]:b.match(K)||[]),c=b.length;while(c--){delete d[b[c]]}(void 0===b||r.isEmptyObject(d))&&(a.nodeType?a[this.expando]=void 0:delete a[this.expando])},hasData:function(a){var b=a[this.expando];return void 0!==b&&!r.isEmptyObject(b)};var V=new U,W=new U,X=/^(?![\w\W]*\)|\[[\w\W]*\])$/;Y=/[A-Z]/g;function Z(a){return"true"===a||"false"!==a&&("null"===a?null:a===a+""?a:X.test(a)?JSON.parse(a):a)}function $(a,b,c){var d;if(void 0===c&&1===a.nodeType)if(d="data"-
```

<https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-kayakrairnow&cluster=5> (for a particular user)).

```

a)?n:1.noop},setDebugMatch:function(a){null!=a&&"!"=a?(this.setDebug(!0),e=a):(this.setDebug(!1),e=null)},ready:function(a,c)
{R9.events._globals[a]=c;R9.events.publish(a,c)},unready:function(a){delete R9.events._globals[a]},_pub:function(a,c){(R9.events._queue[a]||
[]).forEach(function(b){b(a,c)}),_sub:function(a,c){R9.events._queue.hasOwnProperty(a)||R9.events._queue[a]=[];if("number"===typeof
c.priority&&-1<c.priority){for(var b=0;b<R9.events._queue[a].length;b++){var d=R9.events._queue[a].priority;
if(void 0===d||-1===d|>priority)break}R9.events._queue[a].splice(b,0,c)}else R9.events._queue[a].push(c)},_unsub:function(a,c){var
b=R9.events._queue[a];b&&(R9.events._queue[a]=b.filter(function(a){return a!=c})),_queue:{},_debug:!1,_globals:{}})(window.jq||window.jQuery);
(function(e){var c=R9.logger&&new R9.logger("framework/question");R9.publish("question",{_questionAnswerMap:{},answer:function(a,b)
{a=a.replace(/\./g,"_");this._questionAnswerMap[a].call({questionName:a,b})}}catch(d){c.error("Error in
question.ask ("+"+a+""),d,{questionName:a})}R9.events._debug&&console.warn("Missing question answer: '%s'. No component is registered to answer this
question".format(a));return null},forget:function(a){a=a.replace(/\./g,"_");return this._questionAnswerMap[a]?delete
this._questionAnswerMap[a]:!0}:!1}})(window.jq||window.jQuery);(function(d){var b=!1;try{window.localStorage.setItem("vendor-support-
test","success?"),window.localStorage.removeItem("vendor-support-test"),b=!0}catch(a){d.publish("storage",{get:function(a){if(b)
{a=localStorage.getItem(a);try{return JSON.parse(a)}catch(c){return a}}},set:function(a,c){try{b&&(null!=c&&"object"===typeof c?
localStorage.setItem(a,JSON.stringify(c)):localStorage.setItem(a,c))}catch(e){}},remove:function(a){try{b&&localStorage.removeItem(a)}catch(c)
{}}},clear:function(){b&&localStorage.clear()}}),
isAvailable:function(){return b}})(R9);(function(g,c,e){var f=function(a){(new g.logger).error(Error(a));g.publish("template",{_parsedComponents:
{}},render:function(a,b){a=this.getTemplate(a);return e.render(a,b|{})),renderElement:function(){return
c(this.render.apply(this,arguments))},renderFromString:function(a,b,c){var d=this._parsedComponents[b];void 0===d&&
(d=a,this._cacheParsedTemplate(d,b));return e.render(d,c|{})),renderElementFromString:function(){return

```

(*Id.* (for a particular user)).

90. On information and belief, the Accused Instrumentality performs the step of receiving a template program (*e.g.*, code, instructions, etc. that are executed to create a user page) specific to the user using the user identifier (*e.g.*, as explained above, in order to display pages customized for a user subsequent to their login, the template program used to create the customized page must be tied to the user's account credentials), wherein the template program is received from one of at least two locations (*e.g.*, main storage at a Kayak.com server or local device storage), the location based upon a frequency of user requests for the customized page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in a main storage server wherein frequently accessed files will be stored in local storage on the user's computer. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available hotel deals, and other site logic-based conditions. The template information can be stored in multiple locations including but not limited to (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

91. On information and belief, the Accused Instrumentality performs that step of executing the template program specific to the user (*e.g.*, generating user-specific web page by executing a template program which is composed of code, instructions, and data) using the real-time information stored in the shared local storage device (*e.g.*, hotel listings, hotel listings based on user's preferred hotel chains, and advertisements pulled from external storage servers/databases and sent to a local Kayak.com web/API server for processing and display) to generate the customized page. As shown above, a user's Kayak.com page will be customized to show current hotel and restaurant deals near the location linked to a user's account, and select preferred hotels.

92. On information and belief, the Accused Instrumentality performs the step of receiving user preferences for the user (*e.g.*, user location, preferred hotel chains, past/saved searches, etc.), and for combining the user preferences with a generic template to form the template program specific to the user (*e.g.*, user-specific web page), wherein the user preferences indicate the items of interest to the user. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users; however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a general template that only defines layout and adding the data to be displayed within the layout. For example, the following screenshots of two different users that have varying current hotels deals displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current hotel deals) shows that the template program is

varied so that each user can receive appropriately customized pages (e.g., the code for each respective page is updated/adapted to pull from different resources so that the appropriate information/data can be referenced/displayed for each user).

First User:

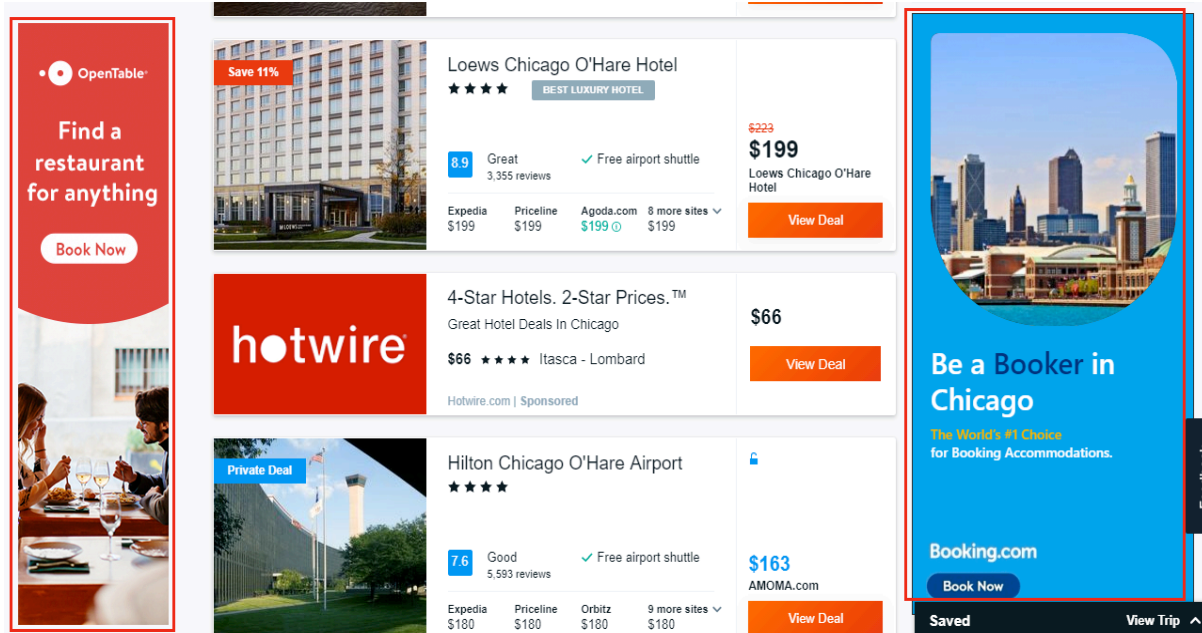
The screenshot displays a travel website interface with two main hotel listings. The left side features vertical banners for Geneva and Zurich, both with the Swiss flag and the text 'Made of Switzerland'. The main content area shows two hotel deals:

Hotel Name	Star Rating	Review Score	Location	Price	Deal Includes	View Deal
The Bryant Park Hotel	★★★★	9.0 Excellent (1,841 reviews)	Manhattan	\$285	Free WiFi	View Deal
The Redbury New York	★★★★	8.0 Great (4,206 reviews)	Flatiron District	\$135	AMOMA.com	View Deal

Below the listings is a 'SHOW MORE RESULTS' button. At the bottom, there are two more Swiss flag banners with the text 'Conditions'.

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:



(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

93. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '359 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

94. On information and belief, Defendant has had at least constructive notice of the '359 patent by operation of law, and there are no marking requirements that have not been complied with.

VII. COUNT V **(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,626,342)**

95. Plaintiff incorporates the above paragraphs herein by reference.

96. On April 18, 2017, United States Patent No. 9,626,342 (“the ‘342 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘342 Patent is titled “Dynamic Page Generator.” The ‘342 patent is not subject to a terminal disclaimer and its term is extended under 35 U.S.C. 154(b) by 891 days. (Ex. M). A true and correct copy of the ‘342 Patent is attached hereto as Exhibit M and incorporated herein by reference.

97. Digi Portal is the assignee of all right, title and interest in the ‘342 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘342 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘342 Patent by Defendant.

98. The application leading to the ‘342 patent was filed December 21, 2012, as a continuation of application no. 11/842,095, which was a continuation of application no. 11/656,636, which is a continuation of 09/393,718, which was a continuation of application no. 08/873,975, which issued as the ’227 patent. (Ex. M at cover).

99. The invention in the ‘342 patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:33-37).

100. The ‘342 patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25.

101. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 7 of the ‘342 patent in Delaware, and elsewhere in the United States, by performing actions comprising performing the claimed method steps, including without limitation through the method implemented of providing a user’s Kayak.com page

(“Accused Instrumentality”). The Accused Instrumentality practices the method of responding to a user request (*e.g.*, a user login request, search initiation, etc.) for a customized page (*e.g.*, a user’s customized home and search pages on the Kayak.com website). (*E.g.*, https://www.Kayak.com/profile/secure/login/?continue=%2Fhttps://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a).

102. On information and belief, the Accused Instrumentality performs the step of generating, via at least one server computer (*e.g.*, Kayak.com server), a template program unique to the user (*e.g.*, a template program will be unique to a user because it is composed of instruction, code, and data that is processed/executed to create a webpage customized to a user), the template program that is unique to the user being used to form the user's customized web page, the template program that is unique to the user being generated using customization information unique to the user (*e.g.*, user location, preferred hotel chains, past/saved searches) and a global template that is generic to a plurality of users. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user’s page will be shared among all users; however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a general template that only defines layout and combining the data selected based on customization information unique to the user to be displayed within the layout. For example, the following screenshots for two different users have varying current hotel and restaurant deals displayed based upon the users’ respective locations (*i.e.*, real-time information selected for the user's customized web page based on the

customization information unique to the user such as current hotel and restaurant deals near a particular location).

First User:

The screenshot displays a travel website interface with two main hotel listings. The left sidebar features a 'Geneva' banner with a 'SWISS' logo and 'Made of Switzerland' text. The right sidebar features a 'Zurich' banner with a 'SWISS' logo and 'Made of Switzerland' text. The main content area shows two hotel listings:

- The Bryant Park Hotel**: 4-star rating, 9.0 review score (Excellent), 1,841 reviews, Location: Manhattan. Price: \$285. Deal includes Free WiFi. View Deal button.
- The Redbury New York**: 4-star rating, 8.0 review score (Great), 4,206 reviews, Location: Flatiron District. Price: \$135. View Deal button.

Below the listings is a 'SHOW MORE RESULTS' button. At the bottom, there are two 'SWISS' logos with 'Made of Switzerland' text and 'Conditions' links.

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

The screenshot displays a Kayak.com search results page for hotels in Chicago. The page is framed by a red border. On the left, there is a sidebar with an OpenTable logo and a 'Find a restaurant for anything' button. The main content area shows three hotel listings:

- Loews Chicago O'Hare Hotel:** 4-star rating, 'BEST LUXURY HOTEL' badge, 8.9 rating, 3,355 reviews, 'Free airport shuttle' feature. Prices range from \$199 to \$223. A 'View Deal' button is present.
- Hotwire 4-Star Hotels:** '2-Star Prices' badge, 'Great Hotel Deals In Chicago', \$66 price, 4-star rating, 'Itasca - Lombard' location. A 'View Deal' button is present.
- Hilton Chicago O'Hare Airport:** 4-star rating, 'Private Deal' badge, 7.6 rating, 5,593 reviews, 'Free airport shuttle' feature. Prices range from \$180 to \$163. A 'View Deal' button is present.

On the right, there is a sidebar with a Booking.com logo and a 'Be a Booker in Chicago' button. A 'Feedback' button is located at the bottom right. The bottom of the page shows a 'Saved' button and a 'View Trip' button.

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a

(for a particular user)).

103. For example, a user can also customize their Kayak.com page by selecting preferred hotel chains, so the corresponding hotels can be displayed.

Your brands

Airlines

Add airlines you prefer or would like to avoid

Preferred

Avoid

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

Park Hyatt X

Q

Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

First User:

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

Park Hyatt X



Q

Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

 [Create a Price Alert](#)

	<div><div>The Roxy Hotel Tribeca</div><div>8/2 - 8/3New York, NY</div><div>2 guests, 1 room</div></div>	<div><div>Delete</div><div>\$209</div><div>View</div></div>
<div><div><div>Alerts</div><div>ON</div></div></div>		<div>View in New York Trip</div>
	<div><div>The Marlton Hotel</div><div>8/2 - 8/3New York, NY</div><div>2 guests, 1 room</div></div>	<div><div>Delete</div><div>\$235</div><div>View</div></div>
<div><div><div>Alerts</div><div>ON</div></div></div>		<div>View in New York Trip</div>

(<https://www.kayak.com/profile/notifications> (for a particular user)).

Second User:

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

JW Marriott X

Search hotel chains


Suggested Hotel Chains



Aloft +

Cambria Suites +

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

 [Create a Price Alert](#)

	Cambria Hotel Chicago Mag Mile 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete \$349 View
<input checked="" type="checkbox"/> Alerts ON	View in Chicago Trip	
	Aloft Chicago Downtown River North 8/3 - 8/4 Chicago, IL 2 guests, 1 room	Delete \$259 View
<input checked="" type="checkbox"/> Alerts ON	View in Chicago Trip	

(<https://www.kayak.com/profile/notifications> (for a particular user)).

104. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (*e.g.*, Kayak.com server), the user's template program (*e.g.*, instructions, code and data used to create a user webpage) to generate the user's customized web page, the user's customized web page including real-time information (*e.g.*, hotel listings, advertisements) selected for the user's customized web page based on the

customization information unique to the user (e.g., user location, preferred hotel chains). For example, a user's Kayak.com page will be customized to show current hotel deals near the location linked to a user's account.

First User:

The screenshot displays a Kayak.com search results page. At the top, the search bar shows "Citizenm New York Bowery - New York, NY" with a red box around it. The dates are "Fri 8/2" and "Sat 8/3". Below the search bar, the left sidebar contains filters for "Stars" (0+ to 5), "Review score" (0+ to 9+), "Price" (\$49 to \$1095), and "Freebies" (Free breakfast, Free parking, Free Internet, Free cancellation). The main content area shows "716 of 1995 hotels and homes" sorted by "Recommended". The first hotel listing is "Citizenm New York Bowery" with a 4-star rating, a 9.2 "Excellent" review score, and a price of \$199. A red box highlights the "Location: Lower Manhattan". Below this, a section titled "Open to alternatives? We recommend these nearby hotels:" shows "W New York - Downtown" with a 4-star rating, an 8.5 "Great" review score, and a price of \$199. A red box highlights the "Location: Financial District".

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

Chicago, IL

Sat 8/3 Sun 8/4

281 of 749 hotels and homes Sorted by Recommended

Go to map

Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price

Palmer House a Hilton Hotel

★★★★

8.4 Great 10,125 reviews

Location Downtown Chicago

Hotels.com Priceline Orbitz 9 more sites

\$359 \$359 \$359 \$359

Save 19%

\$443

\$359

Expedia

View Deal

Chicago Marriott O'Hare

★★★

BEST BUSINESS HOTEL

\$169

Priceline

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

105. For example, a user can also customize their Kayak.com page by selecting their preferred hotel chains, so that preferred hotels can be displayed.

First User:

Hotel chains

Add hotel chains you prefer or would like to avoid


Preferred


Park Hyatt X

Search hotel chains

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts
 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209	View
<input checked="" type="checkbox"/>	Alerts ON	View in New York Trip		

	The Marilton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235	View
<input checked="" type="checkbox"/>	Alerts ON	View in New York Trip		

(<https://www.kayak.com/profile/notifications> (for a particular user)).

Second User:

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

JW Marriott ×

Search hotel chains


Suggested Hotel Chains


Aloft +

Cambria Suites +

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts [Create a Price Alert](#)

 <div> Cambria Hotel Chicago Mag Mile Delete </div> <div> 8/3 - 8/4 Chicago, IL </div> <div> 2 guests, 1 room </div>	<div> \$349 </div> <div> View </div>
<input checked="" type="checkbox"/> Alerts ON	View in Chicago Trip

 <div> Aloft Chicago Downtown River North Delete </div> <div> 8/3 - 8/4 Chicago, IL </div> <div> 2 guests, 1 room </div>	<div> \$259 </div> <div> View </div>
<input checked="" type="checkbox"/> Alerts ON	View in Chicago Trip

(<https://www.kayak.com/profile/notifications> (for a particular user)).

106. On information and belief, the Accused Instrumentality performs the step of in response to receiving a subsequent request for the user's customized web page (*e.g.*, user login); receiving, via the at least one server computer (Kayak.com server), the template program that is unique to the user from one of at least two locations (*e.g.*, main storage at a Kayak.com server or local storage on the user's device), the location determined from the frequency of the request for the user's customized web page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in a main storage wherein frequently accessed files will be stored in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available hotels and restaurants, other site logic-based conditions. On information and belief, the template information can be stored in multiple locations: (1) at runtime, in a Javascript

object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

```
a.removeEventListener("load",R),r.ready()}"complete"===d.readyState||"loading"!==d.readyState&&d.documentElement.doScroll?a.setTimeout(r.ready):(d.addEventListener("DOMContentLoaded",R),a.addEventListener("load",R));var S=function(a,b,c,d,e,f,g){var h=0,i=a.length,j=null==c;if("object"===r.type(c)){e=!0;for(h in c)S(a,b,h,c[h],!0,f,g)}else if(void 0!==d&&(e=!0,r.isFunction(d))||g=!0,j&&(g?(b.call(a,d),b=null):(j=b,b=function(a,b,c){return j.call(r(a),c)})),b)for(h<i;h++)b(a[h],c,g?d:d.call(a[h],h,b(a[h],c)));return e?a:j?b.call(a):i?b(a[0],c):f,T=function(a){return 1===a.nodeType||9===a.nodeType||11===a.nodeType;function U(){this.expando+=U.uid++;U.uid=1,U.prototype={cache:function(a){var b=a[this.expando];return b||(b={},T(a)&&(a.nodeType?b[r.camelCase(b)]=c;else for(d in b)e[r.camelCase(d)]=b[d];return e},get:function(a,b){return void 0===b?this.cache(a):a[this.expando]&&a[this.expando][r.camelCase(b)]},access:function(a,b,c){return void 0===b||b&&"string"===typeof b&&void 0===c?this.get(a,b):(this.set(a,b,c),void 0!==c?c:b)},remove:function(a,b){var c,d=a[this.expando];if(void 0!==d){if(void 0!==b){r.isArray(b)?b=b.map(r.camelCase):(b=r.camelCase(b),b=b in d?[b]:b.match(K)||[]),c=b.length;while(c-->0)delete d[b[c]]}(void 0===b||r.isEmptyObject(d))&&(a.nodeType?a[this.expando]=void 0:delete a[this.expando])},hasData:function(a){var b=a[this.expando];return void 0!==b&&!r.isEmptyObject(b)}},var V=new U,W=new U,X=/^(?:\{[\w\W]*\}|\[[\w\W]*\])$/,&Y=/[A-Z]/g;function Z(a){return"true"===a||"false"!==a&&("null"===a?null:a===+a+""?a:X.test(a)?JSON.parse(a):a)}function $(a,b,c){var d;if(void 0===c&&1===a.nodeType)if(d="data-"
```

([https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-](https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-kayakraibow&cluster=5)

[kayakraibow&cluster=5](https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-kayakraibow&cluster=5) (for a particular user)).

```
a)?n:1.noop},setDebugMatch:function(a){null!=a&&"!a?(this.setDebug(!0),e=a):(this.setDebug(!1),e=null)},ready:function(a,c){R9.events._globals[a]=c;R9.events.publish(a,c),unready:function(a){delete R9.events._globals[a]},_pub:function(a,c){(R9.events._queue[a]||[]).forEach(function(b){b(a,c)}),_sub:function(a,c){R9.events._queue.hasOwnProperty(a)||R9.events._queue[a]=[];if("number"===typeof c.priority&&1<c.priority)for(var b=0;b<R9.events._queue[a].length;b++){var d=R9.events._queue[a].priority;if(void 0===d||1===d||d>priority)break;R9.events._queue[a].splice(b,0,c)}else R9.events._queue[a].push(c)},_unsub:function(a,c){var b=R9.events._queue[a];b&&(R9.events._queue[a]=b.filter(function(a){return a!=c})),_queue:{},_debug:!1,_globals:{}}}(window.jq||window.jQuery);(function(e){var c=R9.logger&&new R9.logger("framework/question");R9.publish("question",{_questionAnswerMap:{},answer:function(a,b){a=a.replace(/\./g,"_");this._questionAnswerMap.hasOwnProperty(a)&&console.error("Duplicate question name "+a+" is being overwritten.");"function"!==typeof b?console.error("Handler for answer is not a function"):this._questionAnswerMap[a]=b,ask:function(a,b){(a=a.replace(/\./g,"_"))||console.error("Missing question name - may cause weird stuff to happen");if(this._questionAnswerMap.hasOwnProperty(a)&&"function"===typeof this._questionAnswerMap[a])try{return this._questionAnswerMap[a].call({questionName:a},b)}catch(d){c.error("Error in question.ask ("+"+a+")",d,{questionName:a})}R9.events._debug&&console.warn("Missing question answer: '%s'. No component is registered to answer this question".format(a));return null},forget:function(a){a=a.replace(/\./g,"_");return this._questionAnswerMap.hasOwnProperty(a)?delete this._questionAnswerMap[a],!0:!1}})(window.jq||window.jQuery);(function(d){var b=!1;try{window.localStorage.setItem("vendor-support-test","success?"),window.localStorage.removeItem("vendor-support-test"),b=!0}catch(a){d.publish("storage",{get:function(a){if(b){a=localStorage.getItem(a);try{return JSON.parse(a)}catch(c){return a}},set:function(a,c){try{b&&(null!=c&&"object"===typeof c?localStorage.setItem(a,JSON.stringify(c)):localStorage.setItem(a,c))}catch(e){}},remove:function(a){try{b&&localStorage.removeItem(a)}catch(c){}},clear:function(){b&&localStorage.clear()}}},isAvailable:function(){return b}})(R9);(function(g,c,e){var f=function(a){(new g.logger).error(Error(a));g.publish("template",{_parsedComponents:{},render:function(a,b){a=this.getTemplate(a);return e.render(a,b)}},renderElement:function(){return c(this.render.apply(this,arguments))),renderFromString:function(a,b,c){var d=this._parsedComponents[b];void 0===d&&(d=a,this._cacheParsedTemplate(d,b));return e.render(d,c)}},renderElementFromString:function(){return
```

([https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-](https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-kayakraibow&cluster=5)

[kayakraibow&cluster=5](https://content.r9cdn.net/res/combined.js?v=212e0e4afb8dd89f291c5119da0645334534b866-kayakraibow&cluster=5) (for a particular user)).

107. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (e.g., Kayak.com server), the received template program that is unique to the user (e.g., instructions, code, and data that is executed to create a customized user webpage) to generate the user's customized web page, the user's customized web page including real-time information (e.g., hotel and restaurant listings and advertisements) selected for the user's customized web page in response to the subsequent request (e.g., user


login, search initiation, etc.) and based on the customization information unique to the user (e.g., user location, preferred hotel chains, interest/habits).

The screenshot displays a web interface for searching restaurants. At the top, a search bar shows "New York, NY" (highlighted with a red box), a calendar for "Fri 8/2", "2 guests", and a time of "7:30 PM". Below the search bar are filters for price (\$\$, \$\$\$, \$\$\$\$), "Neighborhoods", and "Cuisine". The results section shows "1381 of 1381 restaurants" and a "Sort by: Recommended" dropdown. Two restaurants are listed:

- Cara Mia**: 5678 reviews, Italian, Hell's Kitchen | Midtown | Manhattan. Availability: 7:00 pm, 7:15 pm, 7:30 pm, 7:45 pm, 8:00 pm. Distance: 0.1 mi from (highlighted with a red box).
- Carmine's - 44th Street - NYC**: 4114 reviews, Italian, \$\$. Availability: 9:30 pm, 10:00 pm. Distance: 0.3 mi from (highlighted with a red box).

On the right, a map shows the location of these restaurants in Hell's Kitchen, Manhattan, near W 44th St and W 45th St. Other landmarks like "Hell's Kitchen Pa" and "Frames Bowling Lounge" are also visible.

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).



Cara Mia


★★★★☆ 5678 reviews

Italian |

Hell's Kitchen | Midtown | Manhattan

7:00 pm 7:15 pm 7:30 pm 7:45 pm 8:00 pm

0.1 mi from



Carmine's - 44th Street - NYC


★★★★★ 4114 reviews

Italian | \$\$

Midtown | Manhattan

9:30 pm 10:00 pm

0.3 mi from



Becco

★★★★☆ 3042 reviews

Italian | \$\$

Hell's Kitchen | Midtown | Manhattan

5:00 pm 7:15 pm 7:30 pm 7:45 pm 8:00 pm

0.1 mi from

(https://www.kayak.com/restaurants/New-York,NY-c15830/2019-08-02/1930/2guests?sort=rank_a (for a particular user)).

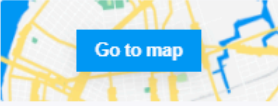
108. For example, a user's Kayak.com page will also be customized to show current restaurant and hotel deals near the location linked to a user's account.

First

User

Citizenm New York Bowery - New York, NY Fri 8/2 Sat 8/3 🔍

716 of 1995 hotels and homes Sorted by Recommended ▾



Go to map

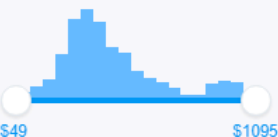
Stars

0+ 2 3 4 5

Review score

0+ 6+ 7+ 8+ 9+

Price



\$49 \$1095

Nightly base price ▾

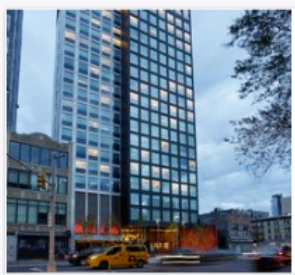
Freebies

☐ Free breakfast 267

☐ Free parking 93

☐ Free Internet 648

☐ Free cancellation 27



Citizenm New York Bowery
★★★★

9.2 Excellent
2,598 reviews

Location
Lower Manhattan

Hotels.com	citizenM	TripAdvisor	8 more sites ▾
\$199	\$199	\$199	\$199

\$199
Expedia


Deal includes ⓘ
Free WiFi

View Deal

YOUR FIRST CHOICE.

"great granola and orange juice, im vegan , so i could only eat that. Location fantastic!" by Anna

Open to alternatives? We recommend these nearby hotels:



W New York - Downtown
★★★★

8.5 Great
1,270 reviews

Location
Financial District

Expedia	Booking.c...	AMOMA.c...	9 more sites ▾
\$199	\$199	\$177	\$199

\$199
Priceline

View Deal

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a (for a particular user)).

109. For example, a user can also customize their Kayak.com page by selecting preferred hotel chains, so the corresponding hotels can be displayed.

First User:


Hotel chains


Add hotel chains you prefer or would like to avoid

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts

 [Create a Price Alert](#)

	The Roxy Hotel Tribeca 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$209 View
<input checked="" type="checkbox"/> Alerts ON			View in New York Trip

	The Marlton Hotel 8/2 - 8/3 New York, NY 2 guests, 1 room	Delete	\$235 View
<input checked="" type="checkbox"/> Alerts ON			View in New York Trip

(<https://www.kayak.com/profile/notifications> (for a particular user)).


Second User:

Hotel chains

Add hotel chains you prefer or would like to avoid

Preferred

JW Marriott X

 Search hotel chains


Suggested Hotel Chains


Aloft +

Cambria Suites +

(<https://www.kayak.com/profile/preferences> (for a particular user)).

Price Alerts [Create a Price Alert](#)

 <div> Cambria Hotel Chicago Mag Mile 8/3 - 8/4 Chicago, IL 2 guests, 1 room </div>	Delete <div>\$349</div> <div>View</div>
<div> <input checked="" type="checkbox"/> Alerts ON View in Chicago Trip </div>	

 <div> Aloft Chicago Downtown River North 8/3 - 8/4 Chicago, IL 2 guests, 1 room </div>	Delete <div>\$259</div> <div>View</div>
<div> <input checked="" type="checkbox"/> Alerts ON View in Chicago Trip </div>	

(<https://www.kayak.com/profile/preferences> (for a particular user)).

110. On information and belief, the Accused Instrumentality performs the step of serving, via the at least one server computer (*e.g.*, Kayak.com server), the user's customized web page (*e.g.*, webpage customized for a user with current hotel and restaurant deals for preferred hotels near their location, and customized advertisements). (*E.g.*, screenshots in paragraph 109).

111. On information and belief, the Accused Instrumentality performs the step of providing a customized page to the user (*e.g.*, a user's Kayak.com page with integrated advertisements) wherein the user template comprises advertisement selection information for use in selecting one or more advertisements for inclusion in the user's customized web page in addition to real-time information selected for the user's web page (*e.g.*, the code for the webpage will include code that allows for the insertion of target advertisements into a user's customized web page which contains real time information such as current hotel and restaurant deals).

First User:

Geneva
Made in Switzerland
Conditions

The Bryant Park Hotel
★★★★★ BEST LUXURY HOTEL
9.0 Excellent 1,841 reviews Location Manhattan
Expedia \$285 Hotels.com \$285 Orbitz \$285 8 more sites
Priceline \$285
Deal includes Free WiFi
View Deal

The Redbury New York
★★★★★ Private Deal
8.0 Great 4,206 reviews Location Flatiron District
Priceline \$199 Hotels.com \$199 Expedia \$199 13 more sites
AMOMA.com \$135
View Deal

SHOW MORE RESULTS

Zurich
Made in Switzerland
Conditions

(https://www.kayak.com/hotels/Citizenm-New-York-Bowery-c15830-h3723180/2019-08-02/2019-08-03/2adults?sort=rank_a (for a particular user)).

Second User:

OpenTable
Find a restaurant for anything
Book Now

Loews Chicago O'Hare Hotel
★★★★★ BEST LUXURY HOTEL
8.9 Great 3,355 reviews ✓ Free airport shuttle
Expedia \$199 Priceline \$199 Agoda.com \$199 8 more sites
Loews Chicago O'Hare Hotel \$229 \$199
View Deal

hotwire
4-Star Hotels. 2-Star Prices.™
Great Hotel Deals In Chicago
\$66 ★★★★★ Itasca - Lombard
Hotwire.com | Sponsored
View Deal

Hilton Chicago O'Hare Airport
★★★★★ Private Deal
7.6 Good 5,593 reviews ✓ Free airport shuttle
Expedia \$180 Priceline \$180 Orbitz \$180 9 more sites
AMOMA.com \$163
View Deal

Be a Booker in Chicago
The World's #1 Choice for Booking Accommodations.
Booking.com
Book Now
Saved View Trip

(https://www.kayak.com/hotels/Chicago,IL-c12514/2019-08-03/2019-08-04/2adults?sort=rank_a
(for a particular user)).

112. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '342 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

113. On information and belief, Defendant has had at least constructive notice of the '342 patent by operation of law, and there are no marking requirements that have not been complied with.

VIII. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent No. 8,352,854 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that one or more claims of United States Patent No. 5,983,227 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- c. Judgment that one or more claims of United States Patent No. 7,171,414 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;

- d. Judgment that one or more claims of United States Patent No. 7,565,359 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- e. Judgment that one or more claims of United States Patent No. 9,626,342 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- f. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- g. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- h. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

August 29, 2019

STAMOULIS & WEINBLATT LLC

OF COUNSEL:

David R. Bennett
Direction IP Law
P.O. Box 14184
Chicago, IL 60614-0184
(312) 291-1667
dbennett@directionip.com

/s/ Stamatios Stamoulis
Stamatios Stamoulis (No. 4606)
800 N. West Street, Third Floor
Wilmington, DE 19809
(302) 999-1540
stamoulis@swdelaw.com

Attorneys for Plaintiff Altair Logix LLC